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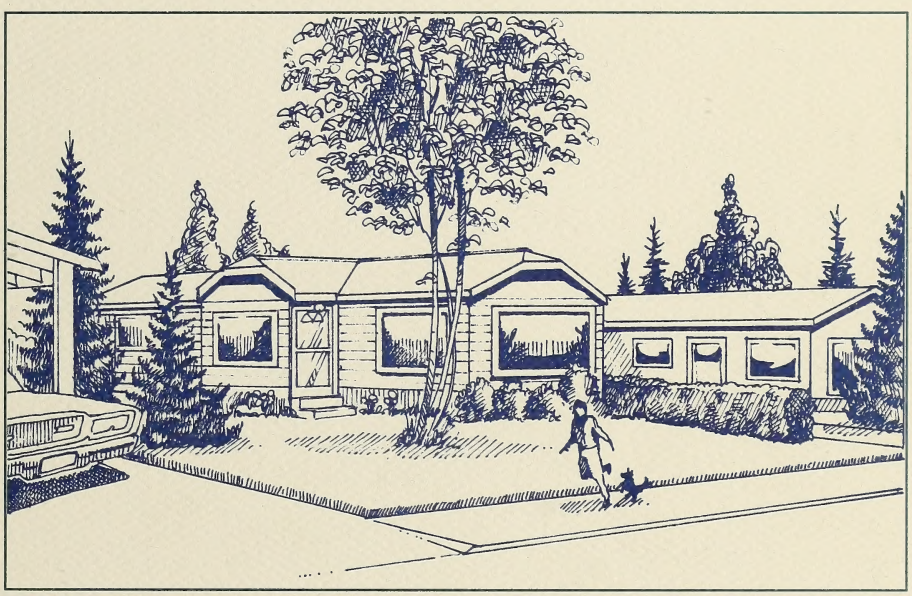
Manufactured Housing Study

Land Use Planning Issues and Guidelines



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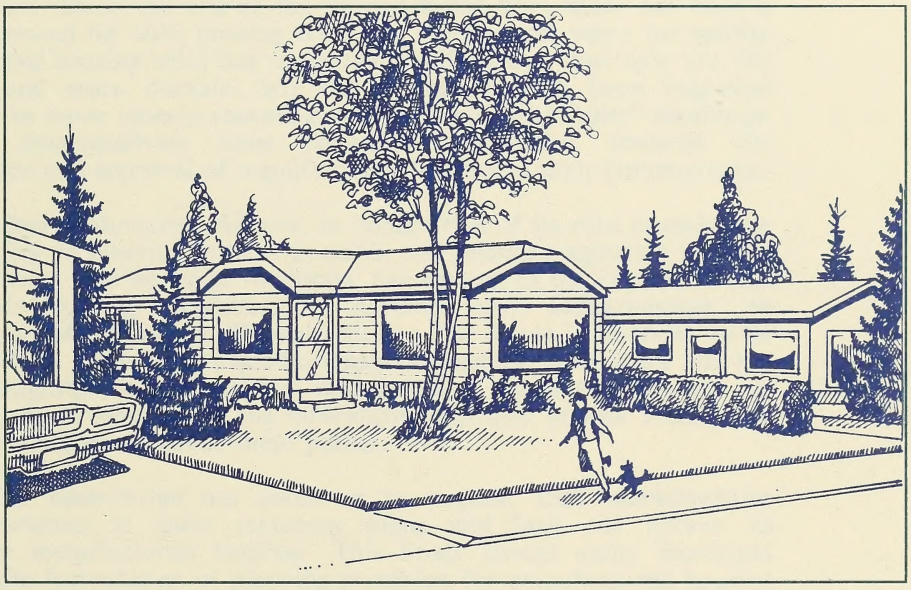
Manufactured Housing Study

Land Use Planning Issues and Guidelines



Prepared by
Lovatt Planning Consultants
and
IMC Consulting Group Inc.
On Behalf of
Alberta Municipal Affairs
and
Manufactured Housing Association of Alberta and Saskatchewan

February 1990

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CityCentre, 10155 - 102 Street, Edmonton, Alberta, Canada T5J 4L4

In Replying Please Quote:

Manufactured Housing Study
Land Use Planning Issues and Guidelines

Manufactured housing is a viable form of housing accommodation. Since the end of the Second World War, there has been a continuous demand for such housing form. In more recent years the quality of manufactured housing units has improved significantly. Not only are the units safer and more durable, but the aesthetics have been improved substantially to more closely resemble conventional "stick built" dwellings. Yet some municipalities have remained ambivalent towards the accommodation and approval of manufactured housing in their communities.

Alberta Municipal Affairs, in recognition of its role to assist the housing industry in meeting market demand, and planning agencies in their land use planning and decision functions, has agreed to the request of the Manufactured Housing Association, Alberta and Saskatchewan to commission the Manufactured Housing Study. The Study is intended to be used by municipal councils and administrators, planners, developers and the public in designing and evaluating manufactured housing proposals. It should be noted, however, that the information outlined in this Study does not necessarily represent government policy.

The Association has asked us to request that municipalities consider provisions in their statutory plans and land use bylaws to accommodate manufactured housing. This Study should assist municipal councils in the formulation of planning provision for manufactured housing development.

Raymond A. Speaker
Minister

Archie R. Grover
Deputy Minister

February, 1990

Acknowledgements

The Manufactured Housing Study was undertaken under the direction of a Steering Committee. The contribution, ideas and direction provided by the members of that Committee, as well as the technical advisors to the study, are greatly appreciated. The Steering Committee members were as follows:

Mr. Larry Allan	Housing Division Alberta Municipal Affairs
Mr. Norm Chiles	Manufactured Housing Association of Alberta and Saskatchewan
Mr. Paul Fenwick (to September/89)	Palliser Regional Planning Commission
Mr. Dale James (to March/89)	Alberta Mortgage and Housing Corporation
Mr. John Ratzke	Manufactured Housing Association of Alberta and Saskatchewan
Mr. Jack Thomas Chairman	Planning Services Division Alberta Municipal Affairs
Mr. Jim Vermette (from April/89)	Alberta Mortgage and Housing Corporation
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Technical advice was provided by Mr. Blair Turner, Executive Director, Manufactured Housing Association of Alberta and Saskatchewan and the technical coordinator was Mr. Tom Hong, Planning Services Division, Alberta Municipal Affairs.

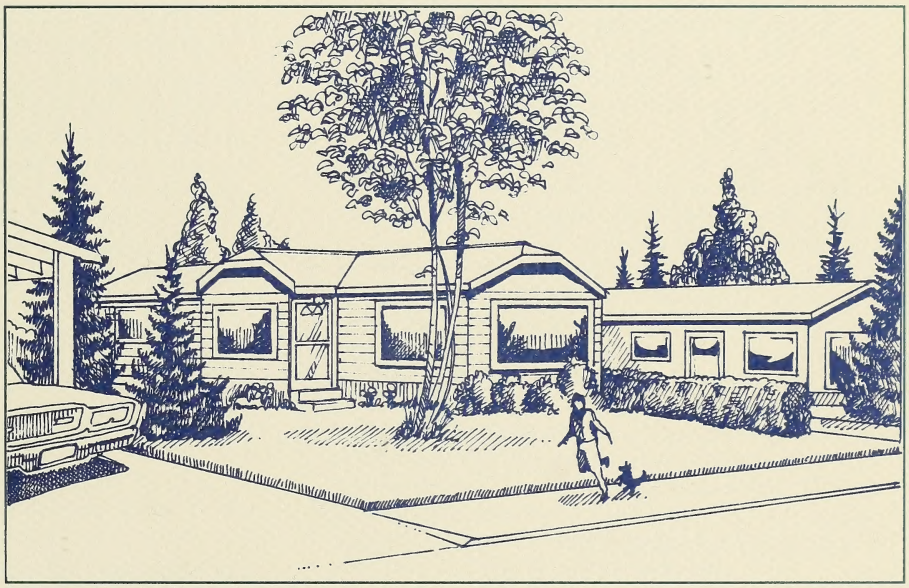
Table of Contents

		Page
1.0	**Introduction**	**1**
	1.1 Purpose	1
	1.2 Background	1
	1.3 Guideline Objectives	2
	1.4 Definitions	2
	1.5 Document Organization	2
Part I: Issues		
2.0	**Overview of Manufactured Housing Today**	**3**
	2.1 Alberta	3
	2.2 Other Provinces	3
	2.3 The United States	4
3.0	**Manufactured Housing Issues**	**6**
	3.1 The Unit	6
	3.2 Mobile Home Parks	11
	3.3 Mobile Home Subdivisions	16
	3.4 Other Ownership Options	18
	3.5 Planning Standards	19
	3.6 The Municipal Role	19
	3.7 The Role of Industry	20
4.0	**Concluding Statement**	**22**
Part II: Guidelines		
5.0	**Guidelines Description**	**23**
	5.1 Project Location	23
	5.2 Project Setting	23
	5.3 Land Use Elements	25
	5.4 Resident Services	26
	5.5 Infrastructure	27
	5.6 Amenity Treatment	28
	5.7 Housing Unit Elements	30

6.0 Guideline Implementation 34
6.1 Regional and Statutory Plans 34
6.2 Land Use By-Law Districting 35
6.3 Site Specific Development Control 38
6.4 The Development Agreement 38
6.5 The Development Permit 39

Appendix I: Bibliography 41
Appendix II: List of contacts 43
Appendix III: Mailout survey 45
Appendix IV: R-4 Residential (Relocatable Dwelling Unit) District — City of Red Deer land use bylaw 48
Appendix V: Example — Direct Control District Bylaw 49

Introduction



1.0 Introduction

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1.0 Introduction

1.1 Purpose

The Manufactured Housing Study has been undertaken to foster a better understanding of the current manufactured housing product and to encourage municipal authorities to consider accommodating this form of housing in their communities. For the purpose of this study, manufactured housing means any dwelling unit, manufactured in single or multiple sections, either in whole or in part, at an off-site location and which is:

- designed to be utilized with or without a permanent foundation,
- constructed to be transported from point of manufacture to its destination of residence,

and at time of manufacture, conformed to CAN/CSA Z240MH Series — M86 and is capable of being transported on its own chassis. A double wide unit simply refers to two such units physically joined together to form a single larger unit. The dwelling unit referred to in this study should not be confused with modular units which are manufactured in component pieces in a factory and then assembled on site.

The study focussed on two principal objectives:

- to identify the key issues surrounding manufactured housing in Alberta today,
- to develop land use planning and design guidelines related to manufactured housing, along with recommendations for implementing such guidelines.

The issues identified served as the basis for developing the planning and design guidelines. They also provide the necessary background information for interpreting and using the guidelines. The guidelines themselves are intended to be used as an advisory tool by municipal councils and administrators, planners, developers and the public in designing and evaluating manufactured housing development proposals.

Specifically, they are intended to:

- provide up-to-date **INFORMATION** on what constitutes good manufactured housing development;
- promote **GOOD DEVELOPMENT** through the use of this information in both the project design and approval process;
- encourage developer **INTEREST** in good design without a substantial impact on product cost; and,
- provide a **CHECKLIST** of land use and design principles to be considered in the project review process.

1.2 Background

Manufactured housing is a viable form of housing accommodation. A continuous demand for such housing since its introduction into Alberta in the post World War II period is testimony to its viability. In the early years, manufactured housing was used primarily for low cost accommodation and for emergency shelter purposes. The quality of the units, and the aesthetics of manufactured housing communities, were often inferior to conventional housing development. These factors resulted in a negative public perception of this housing form which persists to this day. However, the quality of manufactured housing units has improved significantly in recent years. Not only are the units safer and more durable, but the aesthetics have been improved substantially to more closely resemble conventional, "stick built" single family housing. Also, new mobile home parks and subdivision development have improved dramatically since the early "trailer park" era of development. Yet some municipalities have remained ambivalent towards the accommodation of manufactured housing in their land use plans and by-laws. Others, which have recognized this form of housing in such plans and by-laws, have nonetheless been reluctant to grant approvals to manufactured housing developments as a result of prevailing negative attitudes.

In recognition of its vastly improved product, and the need to better communicate the existence of such improvements to municipalities, the Manufactured Housing Association of Alberta and Saskatchewan has requested that Alberta Municipal Affairs provide some assistance in this regard. In recognition of its role to assist the housing industry in meeting market demand, and planning agencies and municipalities in their land use planning and decision making functions, Alberta Municipal Affairs agreed to commission this study. It is not the intent of this study to refute, rewrite or substantially modify findings and conclusions of previous related studies. Rather, the approach taken consolidates and updates such previous work.

1.3 Study Approach

The approach selected for undertaking this study involved three interrelated components. First, an exhaustive inventory of available literature dealing with the issues and treatment of manufactured housing was completed. Because of the available wealth of such literature, substantial primary research was not considered necessary. Second, a comprehensive survey of both public and private sector agencies and individuals involved in the approval and/or delivery of manufacturing housing was undertaken. And third, what is being done elsewhere in certain selected provinces and the United States was investigated.

The inventory of available literature determined that, although substantial documented information related to manufactured housing is available, much of this material was published prior to 1980 and is not particularly relevant to manufactured housing today. The land use by-law, introduced into the Alberta planning system since 1978, incorporates and supercedes much of the earlier literature information. These local by-laws regulate manufactured housing and all other forms of development. Therefore, although the pre-1978 information was reviewed, the focus has been on the more recent material. A bibliography of all the literature reviewed is contained in Appendix I.

The public and private sector agencies and representatives contacted during the course of the study are listed in Appendix II. Local Alberta representatives were requested to provide input into the study either verbally or through written response. To assist those contacted in providing appropriate input, a series of questions related to key manufactured housing issues and a covering letter of explanation were distributed. The letter and questions are included in Appendix III. In order to eliminate potential bias, the questions were designed to serve as a guide only, and to provide considerable flexibility in terms of response emphasis.

Across Canada, input was obtained directly from British Columbia, Saskatchewan, and Ontario. The status of manufactured housing in the United States also was investigated and input was obtained from some of the western states.

1.4 Definitions

Where appropriate, the discussion of key issues and the land use planning and design guidelines differentiate between park and subdivision types of development. For the purpose of this study, the following definitions apply.

The Park: A mobile home park is a parcel of land under single ownership on which two or more homes are located. Ownership of the home is separated from the property and the property is either rented as plots to individual home owners or held in common ownership through a cooperative or condominium arrangement.

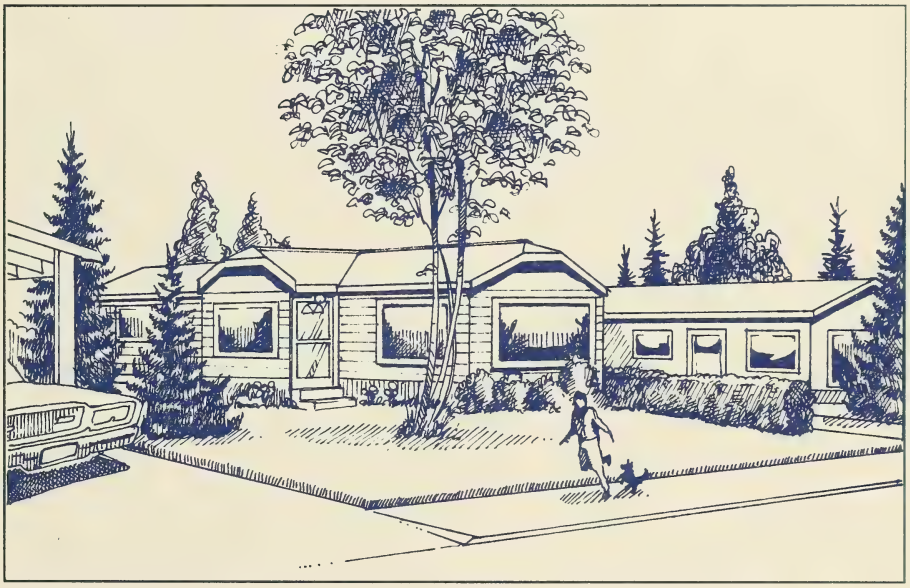
The Subdivision: A mobile home subdivision is a development where individual lots are registered as per the Planning and Land Titles Acts and the home owner may own both the home and the associated lot. As such, mobile home subdivisions are treated in the same manner as conventional residential subdivisions.

1.5 Document Organization

This document is divided into two parts. Part I deals with manufacured housing issues and is comprised of Sections 2.0 to 4.0 inclusive. Section 2.0 provides a brief overview of the status of manufactured housing today in Alberta, the remainder of Canada and the United States. The key issues related to manufactured housing which the land use planning guidelines must address are identified and discussed in Section 3.0. Potential solutions have been included where appropriate. Section 4.0 describes what is needed for encouraging a more successful approach to manufactured housing than has occurred in the past. This description is provided in the form of a concluding statement. Part II of the document contains the actual guidelines themselves along with recommendations for implementing the guidelines. The land use planning and design guidelines are described in Section 5.0 of Part II and suggested methods for implementation, within the Alberta planning system, are discussed in Section 6.0.

Part I:

- Issues



2.0 Overview of Manufactured Housing Today

3.0 Manufactured Housing Issues

4.0 Concluding Statement

2.0 Overview of Manufactured Housing Today

2.1 Alberta

The survey undertaken of public and private sector agencies and individuals determined that the negative perceptions and stigma which have plagued the manufactured housing industry since its inception, still persist in Alberta today. This is particularly true in urban areas, where most such housing is located, and in the northern portion of the Province. **In rural areas, where manufactured housing units are relatively isolated, they are not an issue.**

Negative perceptions are stronger and more prevalent in northern Alberta communities than in southern and central regions, because such housing accounts for a substantially greater proportion of total housing stock. This stems, in large part, from the natural resource based, non-agricultural economy of many northern centres, and the locational and activity fluctuation inherent to that industry. Such fluctuations in the past resulted in the need for a "quick," affordable type of housing which then became a permanent feature in the community.

Most of the manufactured housing units in northern communities are concentrated in poor quality "trailer parks." Such parks do not exhibit the modern design standards of newer mobile home park developments and are often inappropriately located in non-residential areas. Also, whereas existing poor quality parks are less obvious in larger urban centres, they are very evident in small communities.

Specific factors contributing to the prevailing negative perceptions of manufactured housing are discussed in some depth in Section 3.0. However, two observations resulting from the comprehensive survey should be stated at the outset.

First, the demand for manufactured housing has decreased since the 1970's. This observation is supported by what little statistical data there is, much of which was compiled for a 1982 study of manufactured housing. The demand is lower in southern Alberta than in the north, where resource development continues to create a demand for this housing form. The approval of the Daishawa Pulp Mill near Peace River is an example of a resource development which results in a continuing need for "quick," affordable factory-built housing. There also appears to be a steady demand for such housing in larger urban centres Province wide, mainly when located in good quality parks. In spite of an overall decrease in demand since the 1970's, recent sales statistics suggest that this trend may be reversing.

Second, many respondents recognize that manufactured housing is a "bonafide" form of residential accommodation, and that the traditional negative perceptions cannot be fairly applied to some of today's modern units and new developments. Nevertheless, they indicate that the stigma persists and will take years of education and promotion through positive local examples to eradicate.

Only a very few studies dealing with manufactured housing have been undertaken in Alberta since 1980. The most comprehensive and useful of these, in terms of providing background information and identifying issues, is "The Mobile Home in Alberta" study, prepared in 1982 by Reed Management Consulting. A second study, "Manufactured Housing Alternative," is also relevant to this project. The study was prepared in 1983 by Delcan, Deleuw Cather, Western Ltd. and the Manufactured Housing Association. Some of the design solutions provided by this study have been particularly useful in developing the land use planning guidelines.

A number of reports have been prepared by regional planning commissions across the province, often in response to manufactured housing development proposals. These also provide valuable insight into the pertinent issues and some ideas for potential design solutions. The "Bare Land Condominium in Alberta" report prepared for Alberta Housing, has been reviewed along with numerous municipal land use by-laws, reports evaluating such by-laws and other statutory plans. The relevant findings of these literature sources are included in the issues discussion, and pertinent design solutions have been considered in developing the guidelines.

2.2 Other Provinces

Three other provinces, including Saskatchewan, British Columbia and Ontario, were contacted in an attempt to obtain innovative ideas related to the treatment of manufactured housing development. Saskatchewan and British Columbia were selected on the basis of geographic proximity. Ontario was selected on the premise that it would be as progressive in dealing with this type of housing as it has with other housing forms. Also, discussions with Canada Mortgage and Housing Corporation (CMHC) and the Canadian Manufactured Housing Institute (CMHI) indicated that these three provinces would provide a representative cross-section of what was happening elsewhere in Canada. Further, CMHC and CMHI officials stated that British Columbia and Alberta in

particular, were among the most progressive of all the provinces in dealing with manufactured housing issues and developing new guidelines. Neither organization was aware of any new innovative approaches or the existence of published guidelines for manufactured housing development, over and above that which already exists locally. CMHC recognizes that its Site Planning Handbook is dated and, as a result of a request from CMHI, is contemplating updating the Handbook in the near future.

Discussions with local consultants and Ministry of Housing representatives in Ontario, revealed that the 1977 Ministry publication, "Mobile Home Projects — Site Planning Guidelines," is the most recent relevant information available from that province. Since 1980, attention in Ontario has focused on conventional housing forms. Modular housing is beginning to play a significant role in Ontario's housing industry but is beyond the scope of this study.

Saskatchewan deals with mobile homes in much of the same way as Alberta, that is, at the local level through local land use by-laws. In addition, however, Provincial Mobile Home Regulations were enacted in 1969. These Regulations apply to mobile home parks and are recognized by all local by-laws. The regulations address such topics as: garbage disposal and sanitation; water supply and sewage; mobile home spaces; buffer strips; and, enforcement.

Like Alberta, there are no province wide restrictions placed on the location and development of manufactured housing in British Columbia. Such restrictions are applied by by-law at the municipal level. However, manufactured housing units must comply with the Provincial Building Code. The only provision under the Alberta Building Code which applies to such units deals with sewage hook-ups. Some of the municipal by-laws which apply to mobile homes in British Columbia are considerably more comprehensive than any Alberta land use by-laws. For example, by-laws have been enacted in the District of Surrey and District of Coquitlam which apply exclusively to mobile home parks. These by-laws deal with maintenance as well as basic development issues. However, no other guidelines, at either the local or provincial level, exist.

2.3 The United States

The same issues which apply to manufactured housing in Alberta also apply in the United States. However, as a general rule, the United States has been more progressive in dispelling traditional negative perceptions related to mobile home developments. Well designed, high amenity manufactured housing communities are becoming increasingly popular in warm weather states such as California and Arizona. Theme parks, particularly adult or retirement parks which tend to demand, and locate in, warm climates, are becoming more evident. In some instances, modern manufactured housing communities can offer high quality single family housing at costs normally associated with multi-family developments. A CMHC document, "Opportunities for Manufactured Housing in Canada," attributes much of this to the unit product itself. The document states that "the Americans have largely managed to overcome the negative image of manufactured housing through government support and leadership, and an industry commitment to improve the aesthetic aspects of the product."[1]

Nevertheless, in spite of improvements which have been made in recent years in both unit and park design, many communities continue to discriminate against manufactured housing. Some fourteen states have enacted legislation which prevents such discrimination. However, local ordinances and regulations in some localities are so restrictive that manufactured homes must in effect replicate stick built housing, in order to qualify as a permitted use. Nevertheless, where such regulations are met, manufactured housing is permitted on single family lots and is completely integrated into a conventional residential subdivision.

A 1986 American Planning Association (APA) publication, "Regulating Manufactured Housing," summarizes a large variety of regulatory and development standards related to manufactured housing. The report is based on a comprehensive 1985 survey of 1,030 communities located across the United States. The survey response rate was 35 percent. The surveys sought information on: local zoning and subdivision regulations; where manufactured housing developments were permitted; under what circumstances such development was permitted; problems local governments may be experiencing; the general attitude towards this housing form; and, steps taken to encourage greater use of manufactured housing. The communities were also requested to send the APA any studies or staff reports related to manufactured housing and information about their successful developments which could serve as models to other communities.

1 Canada Mortgage and Housing Corporation: *Opportunities for Manufactured Housing in Canada*, 1985, page 36.

The APA publication summarizes the findings of the survey and provides an extremely useful and current source of information for the purposes of this study. Much of the material contained in the report has served as input in discussing issues and in developing the land use and design guidelines.

A second United States publication which contains some relevant background information and useful guidelines is *Building Tomorrow: The Mobile/Manufactured Housing Industry.* This report takes a very exhaustive look at the entire manufactured housing industry in the United States. The report was published in 1977 and is somewhat dated. However, some of the information contained therein is still applicable. Finally, a 1977 report entitled *Guidelines for Improving the Mobile Home Living Environment,* contains some interesting design examples. Again, the report is somewhat dated in terms of innovative approaches.

To augment the pertinent and recent literature available from the United States, local planners were contacted to obtain innovative guidelines and approaches to manufactured housing development in Boulder, Colorado, Phoenix, Arizona and Mesa, Arizona. Although some materials were obtained, it proved to be of limited value. The same factors which contribute to good quality successful developments in these locations, such as attention to amenity features, design details, and ongoing maintenance, have already been considered in Alberta. An actual set of guidelines related to such factors does not exist, other than in local zoning ordinances.

3.0 Manufactured Housing Issues

3.1 The Unit

3.1.1 Appearance

Issue: The appearance of manufactured housing units has been a major contributor to the prevailing negative perceptions in Alberta related to this housing form, and is considered too dissimilar from conventional, "stick built" single family housing units to be compatible, and fully integrated, with such units.

Discussion: Much of the negative stigma and perception that relates to manufactured housing units results from the appearance of the unit itself. This is particularly applicable to the older 10 to 14 foot single wide units. These units are characterized by such features as flat pitched roofs, aluminum siding and small windows. They can be found in most Alberta communities and, for many residents and local municipal councils, are the only example of manufactured housing with which they are familiar.

Today's 16 foot wide unit is a substantially improved product from the traditional "trailer." This new, safer, more durable, energy efficient unit incorporates larger windows, a pitched asphalt roof, and attractive conventional siding. Nevertheless, the elongated proportions of the unit, the gable ends and the short roof overhangs, continue to identify it as a transportable mobile home. Manufactured housing units are considered too long and too narrow to integrate well with single family stick built housing units. They are too different. The lack of any exterior articulation and uniqueness, variety or architectural interest, further detract from potential acceptance for full integration.

The most common method for addressing the lack of articulation and uniqueness is with additions and accessories, such as porches, decks, and awnings. These features also can serve to soften the line and lengthy configuration of the unit. However, such additions, along with improper skirting and siting of the unit, have in themselves detracted from the overall appearance of manufactured housing in many areas, particularly if the additions have been constructed on site or are improperly attached. Such additions, along with poor skirting methods, can make a basic unit look "cheap and unattractive."

Today, most of the better quality mobile home parks require that any building accessories be specifically designed and built to harmonize, and blend in, with a particular unit. This requirement is supported by some land use by-laws which also provide siting and skirting standards. However, once again, a large portion of Alberta residents are familiar only with the traditional approach towards "trailer add ons."

Much has already been done by the manufactured housing industry to overcome the problems related to the appearance of the older, traditional units by virtue of producing a better product. Many survey respondents felt, that although the product could, and should, be continually improved as new innovations and technologies become available, today's standard mobile home unit represents an acceptable housing form, if placed in a properly designed park or subdivision located within a residential area. However, respondents further stated that full integration into conventional single family residential subdivisions would be acceptable only if manufactured housing replicated "stick built." At the same time, it must be recognized that the unit as it exists now has a niche in the housing market and meets a particular demand segment. To replicate "stick built" or conventional single family housing units, therefore, may be of little value or benefit. Double wides are easier to replicate than single wides, but increased costs detract from the affordability of the home.

Across the remainder of Canada and the United States, the appearance of today's units does not appear to be an issue unless the units are located outside designated manufactured housing areas and are interspersed, and fully integrated, with typical single family residential units. This has occurred in some portions of the United States, where manufactured housing represents a significant segment of the housing market. Where such integration is permitted, architectural and design standards and requirements have been established at the local level. The intent of the required standards is to ensure compatibility with conventional housing by replicating such housing. Some communities require only that siding and roofing materials be the same as those used in conventional homes in the area. Others deal with roof pitch and overhang, type of exterior material, minimum unit size, elevations and landscaping. Permanent foundations are required in all instances.

Examples of architectural and design standards which could be applied to both single wide and double wide units have been developed by San Diego

2 Sanders, Welford: "Regulating Manufactured Housing," American Planning Association, Planning Advisory Service Report Number 398, 1986, pages 8-9.

County, California and Portland, Maine.[2] However, in Portland the unit lot orientation requirement adds substantially to the overall cost of the package and makes it economically difficult to locate in a standard residential single family subdivision. The requirements of these two communities are listed below.

San Diego County, California

- *A home must be covered with an exterior material customarily used on conventional dwellings. The exterior covering material must extend to the ground, except that, when a solid concrete or masonry perimeter foundation is used, the exterior covering material need not extend below the top of the foundation.*
- *The roof must be pitched so there is at least a two-inch vertical rise for each 12 inches of horizontal run. It must consist of shingles or other material customarily used for conventional dwellings.*
- *The roof overhang must not be less than one foot measured from the vertical side of the mobile home. When carports, garages, porches, or similar structures are attached as an integral part of the mobile home, the director may waive the eave requirement.*

Portland, Maine

- *At least 40 percent of the roof must be double-pitched at least three in 12 or greater and covered with material that is residential in appearance, including, but not limited to, approved wood, asphalt, corrugated aluminum, corrugated fiberglass, or metal roof.*
- *Exterior siding cannot have a high-gloss finish and must be residential in appearance, including, but not limited to, clapboards, simulated clapboards such as conventional vinyl or similar material, but excluding smooth, ribbed, or corrugated metal or plastic panels.*
- *The home must be placed on a permanent foundation that complies with the City's building code for residential structures.*
- *The hitch, axles, and wheels must be removed.*
- ***The unit must be oriented on the lot so that its long axis is parallel to the street**. A perpendicular or diagonal placement may be permitted if there is a building addition or substantial landscaping so that the narrow dimension of the unit, as modified and facing the street, is no less than 50 percent of the unit's long dimension.*
- *The lot must be landscaped to ensure compatibility with surrounding properties.*
- *The home must be at least 14 feet in width.*
- *All fuel oil supply systems shall be constructed and installed within the foundation wall or underground within all applicable building and safety codes except that any bottled gas tanks may be fenced so as not to be clearly visible from the street or abutting properties.*

A number of United States communities, including Phoenix, Arizona, set minimum width standards which exceed 16 feet, thereby excluding many single wide manufactured housing units. The most stringent of the appearance standards examined during the course of this study apply to both conventional and manufactured housing. These have been developed in Reedley, California and are as follows:[3]

Reedley, California

- *Garages or Carports — A garage or carport shall be provided for every dwelling located on a lot in an R zoning district that is not a part of a mobile home subdivision.*
- *Minimum Floor Area — The minimum floor area for every dwelling located on a lot in an R zoning district, which is not a part of a mobile home subdivision, shall be 800 square feet, excluding the area of garage or carport.*
- *Roof Overhang — All main buildings shall have a pitched roof with a minimum 12-inch roof overhang on each of the dwelling's perimeter walls such that the overhang is architecturally integrated into the design of the dwelling.*

3 Op-cit., page 11.

- *Roofing Material — All main buildings and all detached garages or carports located on the front half of the lot shall have a roof surface of wood shakes, asphalt, composition or wood singles, clay concrete or metal tiles, slate or built-up gravel materials.*
- *Siding Materials — All main buildings and all detached garages located on the front half of the lot shall have exterior siding material consisting of either wood, masonry, concrete, stucco, masonite, or metal lap. The exterior siding material shall extend to ground level, except that when a solid concrete or masonry perimeter foundation is used, the siding material need not extend below the top of the foundation.*
- *Foundation — All main buildings shall be placed on a permanent foundation that meets applicable building code requirements and/or Section 18551 of the California Health and Safety Code, such that the floor elevation of the proposed dwelling is reasonably compatible with the floor elevations of surrounding dwelling units.*
- ***Minimum Width — The minimum width of a dwelling located on a lot outside of a mobile home subdivision shall be 20 feet.***
- *Wheels and Axles- All mobile home tow bars, wheels, and axles shall be removed when the dwelling is installed on a residential lot.*
- *Deviations — The building official may approve deviations from one or more of the developmental/architectural standards on the basis of a finding that the architectural style proposed provides compensating design features and that the proposed dwelling will be compatible and harmonious with existing structures in the vicinity. The determination of the building official may be appealed to the planning commission and city council in accordance with Article 8 of this ordinance.*

The Reedley requirements have been included in this document to illustrate what could be involved in attempting to replicate conventional "stick built" housing. Anything less likely would not be acceptable in light of the prevailing negative perceptions associated with manufactured housing. The public must first be prepared to accept such housing within residential districts, in appropriate designated settings, before full integration can be contemplated. In terms of appearance, such acceptance can come about only through example. In other words, the bad examples of the past must be addressed by using today's unit as an example of what manufactured housing does in fact look like and how it can be attractively sited. The responsibility for providing and delivering such examples, as a means of changing public perception related to appearance, rests with the industry.

3.1.2 The Occupant

Issue: Mobile home occupants have been stereotyped as having a low income, being transient and non-family oriented, and generally unstable and undesirable residents. They are considered to have limited resources and short term goals.

Discussion: This perception of manufactured housing occupants has contributed to the negative stigma associated with manufactured housing in general, and stems from the resource based, boom economy that prevailed in Alberta during the 1970's. The perception also stems from the poor quality and condition of many older mobile home developments. An assumption most people draw from these developments is that such conditions reflect the character and socio-economic status of the occupants. There is little data available to either dispel or support this assumption. In some instances, the assumptions may well be correct, but no more so than for any other form of housing. The demographic and socio-economic data which has been collected tends to dispel, rather than support, such assumptions. Also, it should be noted that high mobility does not necessarily mean people are unstable or undesirable.

The most comprehensive compilation and analysis of data related to manufactured housing occupants in Alberta was undertaken in 1982 by Reed Management Consulting. Reed relied upon census data as well as other surveys and studies that had been conducted in Alberta and Manitoba.[4] An Ontario survey of mobile home occupants, undertaken in the mid 1970's, supports the conclusions resulting from the Reed analysis.[5] The occupancy profile conclusions drawn by Reed are listed below:

4 Reed Management Consulting: *The Mobile Home in Alberta*, Department of Housing and Public Works, December, 1982, pages 31-32.

5 Personal communication with Mr. M. Heitshu, Ontario Ministry of Housing.

1. The average income of manufactured housing households is only slightly lower than the average income of single family households, but higher than the average income of apartment and townhouse dwellers, as well as Alberta as a whole.
2. Most mobile home occupants own their own units.
3. The length of residency of manufactured housing occupants is similar to that of single family.
4. The movement of people residing in manufactured housing far exceeds the physical movement of the unit itself. Many units remain permanently fixed on a single site.
5. The occupation of manufactured housing dwellers is related to resource industries.
6. Average household size of manufactured housing households is only slightly smaller than the average Alberta household size — but larger than that of households residing in attached dwellings and apartments.
7. The age distribution of manufactured housing occupants is oriented to the 20-34 year age grouping.

In 1977, the United States study which resulted in the publication of a report entitled *Building Tomorrow: The Mobile/Manufactured Housing Industry*, undertook a series of very comprehensive surveys to arrive at a mobile home occupant profile. The profile is based upon income, ownership, occupation and age data. On the basis of this data, the author of the publication concluded that:

"The primary demand for mobile homes comes from moderate income groups: blue-collar working families and retirees. The average income of mobile home families is much lower than that of families in conventional housing who are, however, less likely to own their own homes. There are more young families..."[6]

The study concludes that income is the most important difference between families occupying mobile homes and those in conventional housing. This suggests that manufactured housing does meet a particular demand in the market place. The most significant factor found in the United States surveys to further dispel the obsolete stereotype myth of the transient, unstable mobile home occupant, is that 85 percent of the families surveyed owned their unit. This compares to 65 percent for conventional housing. Also, over 75 percent of the mobile home families surveyed planned to live in their homes for at least five years, and 60 percent planned to live in mobile homes at their present site. Such information may not be directly applicable to the Alberta scene due to economic, geographic, social and political variances. Nevertheless, it does serve as an indicator that the conclusions drawn by the Reed study are basically correct. It also serves to further dispel the unsavory reputation that has been foisted on mobile home occupants.

6 Bernhardt, Arthur: *Building Tomorrow: The Mobile/Manufactured Housing Industry*, 1977, page 241.

3.1.3 Affordability and Financing

Issue: The affordability of the manufactured housing unit is its most attractive feature. Yet, the very characteristics which make such units affordable, result in financing arrangements considerably different than for conventional housing.

Discussion: Affordability is the major reason why most occupants purchase manufactured housing units. This has been substantiated by surveys and studies undertaken in Alberta, other parts of Canada, and the United States. For many, the manufactured housing unit provides an affordable starter home while also allowing for detached living. For some, it may be the only home they will ever be able to afford. For retirees, such units provide a low maintenance, detached housing opportunity commensurate with their needs and reduced incomes.

A good example of the starter home approach was provided by a resident of Evergreen Mobile Home Park in Edmonton. The demographic profile of the resident's household is typical of many mobile home occupants. The mobile home was purchased by the resident five years ago for $22,000 as a starter home. The resident will own the 14 foot wide unit in one more year and, because of its location in an Edmonton park development, anticipates a selling price of $25,000. Substantial improvements in the form of additions have been made to the unit. The monies received from the sale will be used as a downpayment on a conventional single family house. At the same time that equity was being established in the manufactured housing unit, the resident was able to enjoy detached living conditions.

The anticipated resale price for the Evergreen mobile home typifies the cost of existing units. AMHC has indicated that the average price of such units in the second and third quarters of 1989 was $21,640. The average price of a new unit for the same period was $43,595.

A major factor in determining the price of existing manufactured housing units is depreciation. Unlike conventional housing, mobile homes have tended to depreciate rather than appreciate. One reason for this is the life expectancy of the unit. The life expectancy of units manufactured between 1972 and 1976 is rated at 25 years. The expectancy of units manufactured since 1976 has increased to 40 years. The increased expectancy is testimony to the improved quality, durability and safety features of the manufactured housing unit. Yet, in spite of this increase, AMHC's experience with foreclosed units suggests that some units still tend to depreciate.

A second reason for unit depreciation is that most units are located on rented pads as opposed to fee simple lots. The unit price, therefore, is not bolstered by the value of the land. Land values generally tend to appreciate and this appreciation is reflected in the price of both conventional single family dwellings and manufactured housing units located in subdivisions on fee simple lots. Conventional housing units themselves also depreciate over time.

Recent trends in the price of existing units suggests that the depreciation factor may be lessening. AMHC figures indicate that the $21,640 average price of existing units in 1989 is approximately 8% higher than for 1988. This increase, combined with reduced foreclosure rates, suggests an improved trade-up market for manufactured housing units.

Two additional price related factors should be noted. First, the location of an existing or new unit, if purchased from a park dealership, affects the price of the unit. Units found in good quality parks located in major urban centres will cost more than a comparable unit located in a poor quality park in a more remote centre. Similarly, units in high growth areas may command a higher price than those in stable, declining or low growth areas. Second, although the base price of the unit is affordable, this price may be increased substantially with the addition of necessary accessory features. Often, in the case of new units, such additions are not included as part of the financing package.

There are two methods for financing mobile home purchases.

1. Chattel mortgage or loan, if the unit is located on a rental pad or land not owned by the occupant.
2. Conventional mortgage, where the unit is located on a fee simple lot owned by the purchaser, and is permanently affixed. The reason for this is to enable the lending institution to attach a lien to the certificate of title of the lot.

In the case of loans, the purchaser is required to pay higher interest rates than with a conventional mortgage, although these rates can be reduced as a result of AMHC's Mobile Home Loan Insurance Program. The maximum amortization for both a loan and a mortgage is 20 years, as compared to 40 years for conventional housing. These amortization periods reflect the life expectancy of the traditional housing unit, but not today's unit and changes in such periods may now be warranted.

The AMHC Loan Insurance Program is intended to assist mobile home purchasers by protecting the lender. By so doing, the lender provides the purchaser with reduced interest rates, better amortization periods and more favorable financing terms. AMHC insures up to 85 percent of the total unit cost. The remaining 15 percent is required as a minimum downpayment. The program applies to both new and used single and double wide units. An average priced $21,640 used unit, therefore, may be purchased with a downpayment as little as $3,246, making manufactured housing a very affordable alternative.

3.1.4 Advantages of the Unit

Issue: In spite of the negative comments and perceptions which have been directed at manufactured housing units, there are a number of significant advantages to purchasing and/or renting such units.

Discussion: The advantages of owning a manufactured housing unit obviously out weigh any negative aspect for a certain segment of the housing market, particularly since many of the negative aspects affect other nearby residents, not the occupant. These advantages, which are listed below, relate to the unit itself, and are the primary reasons why people purchase mobile homes.

1. The unit allows for detached living at an affordable price.
2. The unit represents good value relative to other forms of housing such as conventional multi unit developments.
3. The ability to own the unit within a reasonable time frame is an advantage to some consumers. This is directly related to the relatively low initial purchase price and, in some instances, the amortization period.
4. The unit allows for a simple purchase package as compared to conventional housing. According to a survey undertaken in Manitoba, "the fact that the dealer can arrange financing, insurance, physical set-up and hook-up and provide a package without delay or legal costs makes the simplicity of purchase and the ease and convenience to the purchaser a compelling reason to buy."[7]
5. In the same vein, immediacy of occupancy is an important advantage for many consumers, particularly in resource centres. According to the Reed Management Study, "the prospective owner ... can add or delete various features as he sees fit yet have the whole package delivered ready to move in to in less then ten days."[8]
6. The limited amount of interior and exterior maintenance required is a desirable feature for those desiring maintenance free living. This is particularly significant for the elderly.
7. Because of the more simplistic financial packaging involved with mobile home purchase; the lower initial investment as compared to conventional housing; the shorter time frame to achieve ownership; and, in most instances, pad rental as opposed to fee simple land ownership arrangement, the commitment to a unit may not be as great as to a conventional home. This may be an advantage to some segment of the manufactured housing market, particularly in resource communities where jobs, and even minor fluctuations in the economy, are closely interrelated.

7 Reed Management Consulting: *The Mobile Home in Alberta*, December, 1982, page 36.

8 Op-cit., page 36.

3.2 Mobile Home Parks

3.2.1 Location

Issue: Mobile home parks in urban areas historically have been located in industrial or commercial areas, and on the outskirts of residential areas well removed from any community services.

Discussion: The location of mobile home parks has long been an issue. Because of the undesirable features of early mobile home parks, they have been considered incompatible with conventional residential development and in the past have not been recognized as a bonafide residential form of development. By virtue of poor placement practices, negative features of parks were perpetuated in that:

1. Developers, at times, viewed a park placed on potential industrial or commercial land as a short term investment and a temporary use; and,
2. Lack of adequate community and social services within a reasonable distance may have discouraged stable family households from locating in such parks.

In the former instance, the transitory nature of the park became a reality once an opportunity to develop the land to its full economic potential could be realized. In the latter instance, the lack of nearby services may have attracted a more unstable, transitory household type and discouraged community-oriented families from moving in. However, such locational practices are no longer permitted in Alberta. Virtually all urban municipalities which recognize manufactured housing as a legitimate housing form designate an appropriate residential land use district to accommodate such housing. These districts usually are located within, or adjacent to, conventional residential areas. As such, occupants residing in mobile home parks are treated in the same manner as the remainder of the community. Some new parks are being located in areas slated for future residential use. There may be some merit to having a park

located in advance of conventional residential development in that the park becomes a recognized and acknowledged reality, rather than an issue to be dealt with "down the road."

In spite of the recognition of most Alberta urban municipalities of the locational requirements of mobile home parks, there are still communities which do not recognize this use in their land use bylaw. Examples include St. Albert and Fort Saskatchewan. Neither community has ever had to deal with a mobile home park proposal, nor are they particularly interested in doing so. Such developments would not complement the quality of residential development both communities encourage.

In other communities, mobile home park proposals are either refused by council, or are still separated from conventional "stick built" housing areas. This has little to do with the local land use bylaws which often recognize mobile home parks as a residential district, but rather, is the result of pressure exerted by affected residents which is based upon traditional prejudices. In other words, parks are legally a permitted use, but locating such parks in, or adjacent to, existing residential development is discouraged. Representatives of one regional planning commission have gone so far as to state that"mobile homes should not be allowed in urban areas. They should be directed to rural areas. If located in an urban area, they should be treated under a Direct Control district..."

At the other end of such extreme viewpoints, is the State of California's recently approved legislation which states that cities can no longer dictate where manufactured housing can be placed. Instead, cities must now allow such housing to locate on all residential lots as long as **the units meet the same standards as conventionally built homes and are in architectural harmony with surrounding houses**. This legislation does not apply to units which are more than ten years old, and will be further discussed in the context of mobile home subdivisions.

The planning solution to encouraging the approval of new mobile home parks within residential growth areas is twofold:

1. The location and design of the park should be considered at the preliminary Area Structure Plan stage.
2. Standards should be developed for the interface between the park and adjacent conventional residential development as in the case in some areas of British Columbia. For example, in communities such as Surrey, a landscaped buffer strip of 7.6 metres is required immediately within the park boundaries.

As is the case when dealing with negative unit appearance perceptions and overcoming discrimination, residents and councils alike need to be shown good local Alberta examples of mobile home park integration within residential areas. As in the case with all other forms of housing development, the primary responsibility of overcoming prejudices and discrimination rests with the developer.

A final item dealing with the location of mobile home parks is suitable access to major roadways to facilitate ease of transporting the units. However, since such access generally is provided for all comprehensive development projects, this is not considered an issue.

3.2.2 Quality of Development

Issue: Excessive densities, poor design, low development standards, lack of landscaping, and lack of unit development and maintenance standards, are the key contributing factors towards poor quality mobile home park developments. Such parks prevail throughout the Province and are the major factor responsible for the negative perceptions related to manufactured housing in general.

Discussion: The stereotypical older form of mobile home park features all of the above noted undesirable characteristics. It is such "trailer" parks, more so than any other factor, which have resulted in the negative stigma associated with manufactured housing. It is because the poor parks are so poor, that strong and often emotional opposition to even the new, good quality parks remains in some communities. The older "trailer" parks exhibit excessive densities, wherein as many homes as possible are "crammed" into a park site. Streets tend to follow a classic grid pattern and units are lined up parallel and very close to one another. On site storage, parking, privacy and yard space is inadequate. Parking spills over on to the roads. Few, if any, development standards were applied so that for example, roads are unpaved and too narrow, and street lighting may be inadequate. Amenity open space, along with community and recreation services and facilities, are

nonexistent. Landscaping also is nonexistent, since there is nothing to landscape, and maintenance is poor. Finally, the units themselves are of varying age and size, and standards with respect to skirting, accessory features and additions, and overall appearance either do not exist or are not enforced. Such parks well deserve the unsavory reputation for quality they have achieved, and it is unfortunate that by their very existence, they continue to tarnish the reputation of the good quality parks.

Good quality parks also are evident in many Alberta communities, particularly in some of the larger centres such as Edmonton, Calgary, Red Deer, Lethbridge, Fort McMurray, and Grande Prairie. The features displayed by good quality parks include the following:

- curvilinear street pattern,
- variation in lot size and configuration,
- reasonable densities,
- well designed separation space between units,
- adequate road width,
- adequate parking and outdoor storage space,
- paving and underground services,
- sidewalks,
- good lighting,
- landscaping and open space,
- recreation and playground equipment,
- community centre,
- laundromat, community store and other primary order services,
- control over the age, type and condition of units,
- control over the size and quality of additions,
- skirting and height reduction requirements,
- entrance feature and fencing.

In effect, such parks recognize, and incorporate, good urban design principles, and architectural and development standards and controls. Further, **such controls are enforced**.

Numerous examples of park design features and architectural controls exist in British Columbia and some portions of the United States. Clustering for example, to optimize privacy and user appeal, as well create aesthetically pleasing parks, is very common in states such as Arizona and California. Flanking curvilinear collector roadways as opposed to having units front into such roads is another simple, effective design feature being used in conventional subdivisions as well as mobile homes. However, in spite of such examples, the literature survey did not reveal any startlingly different approaches to dealing with the appearance of mobile home parks which can be adapted to Alberta's topographic and climatic conditions. The key to successful parks across North America is to incorporate all applicable quality design and aesthetic features into a comprehensive development package. The ongoing maintenance and management, or implementation of the package, is the next step.

3.2.3 Management

> **Issue**: The management of a mobile home park was repeatedly noted as being the primary factor in determining the quality of the park.

Discussion: Management is crucial to maintaining a high level of quality in a park. Regardless of how well the park is designed or how strong entry standards and occupancy regulations may be, they will be of little benefit unless the park is well maintained and standards and regulations are enforced.

The vast majority of mobile home parks in Alberta are owned by an individual or corporation. Pads or stalls are provided on a rental basis. As such, a lease agreement between the owner and the mobile home occupant is required. Often a set of rules and regulations is attached to, and forms a part of, the lease agreement. Items covered vary from the size and type of pet permitted, to the form, number and location of permitted additions to the unit. The regulations are intended to maintain a certain acceptable standard, and ensure that the rights of all occupants are respected and not infringed upon. At the same time, the owner agrees to provide regular and ongoing park maintenance. Maintenance includes such items as snow removal, street maintenance, garbage pick up and removal, and maintenance of common open space and facilities. The regulations may vary between parks but are similar for most of the newer, better quality parks.

The extent to which the list of rules and regulations are enforced, combined with how stringent and comprehensive the regulations are, largely dictates the quality of the park. Failure to comply with the regulations on the part of the tenant may mean eviction and/or removal of the unit. Failure on the

part of the owner to enforce the regulations, and provide the agreed upon standard of maintenance, is more difficult to enforce. Unlike Saskatchewan, Alberta does not have Provincial Regulations that stipulate maintenance requirements for parks. Maintenance requirements are enforced in some British Columbia communities by by-law at the local level. No such controlling mechanism is available in Alberta so that dissatisfied tenants are forced to either relocate, take legal action or put up with poor maintenance practises. It is not surprising, therefore, that bad relations with park owners and poor lease security have been cited as two common complaints of park occupants. Unfortunately, when faced with the prospect of poor management or relocating, most occupants are forced to assume the former position since local relocation options are often either severely restricted or nonexistent.

For parks which are owned and managed by the occupants, the same principles of management and maintenance standards apply. However, the implementation of such standards is very different from the rental park. This is discussed in Section 3.4, Other Ownership Options.

3.2.4 Advantages of Mobile Home Park Living

Issue: There are a number of advantages to living in a mobile home park that are not available in mobile home or conventional residential subdivisions.

Discussion: The advantages of living in a mobile home park have been identified on the basis of discussions held with industry representatives, planning and municipal authorities and park occupants, as well as the literature review. These advantages do not necessarily apply to all parks in Alberta and have not been weighted in terms of importance. The advantages identified include the following.

1. **Security** was cited as being particularly important for the elderly and/or persons who are often absent from their unit for extensive periods of time. The security factor is very closely related to the private ownership nature of the park.
2. **Privacy**, in terms of the overall park, is a desirable feature of park living. Access is more controlled in that the roadways and common areas are not publicly owned.
3. **Limited outdoor maintenance** is required on the part of the occupant in many parks. In some United States theme parks, virtually all outdoor maintenance, including maintenance of individual yard space, is undertaken by the management. This same practice is now undertaken by some Alberta park owners.
4. **Community spirit** can be more easily generated and maintained in a park like atmosphere, particularly where a club house and other common social and recreational facilities are provided. Again, this is an important selling feature of some retirement parks.
5. **Homogeneity** can be controlled and is considered desirable by a certain segment of the market. Such homogeneity is the basis for the adult retiree and family theme parks which are common in other regions. In Summergate Village, located on Vancouver Island, for example, a minimum occupant age of 45 years has been set.
6. **A controlled living environment** can be maintained in a mobile home park. This is a significant advantage to those concerned about the type, appearance and maintenance of adjacent properties and shared common area.

3.2.5 User Preferences

Issue: User preference surveys are a sound indicator of factors to consider in locating and designing new mobile home parks.

Discussion: Surveys undertaken in the United States for the *Building Tomorrow: The Mobile/Manufactured Housing Industry* study, provide a sound indicator of factors to consider in designing mobile home parks. Although comparable surveys have not been conducted in Alberta, input obtained from provincial planning agencies, municipal representatives, industry representatives, park residents and from relevant studies, suggest that the findings of the United States survey can largely be applied to the local scene.

The United States study grouped the preferences identified into five broad areas. These are listed below.

1. **Privacy** was the most important preference identified. This preference was expressed under the guise of lower densities and larger lots.
2. **Landscaping and open space** also were features that were considered important. This was particularly true of those respondents residing in conventional multiple family types of accommodation.
3. **Community activities** placed third on the list of priorities for mobile home park living. This was particularly important for residents of adult oriented "retirement" type parks.
4. **Variety and individuality** were important to many conventional and manufactured home owners. Although this relates more to the unit than the park, attractive yet unique "looks" created by additions, unit siting and placement, can add substantially to the aesthetic appeal and interest level of a park.
5. **Economy**, as it relates to pad rental, was cited as a major user need and limits the number of improvements mobile home occupants are willing to pay for.[9]

3.2.6 Advantages for the Developer

Issue: As a rule, there are more advantages for a developer to developing a mobile home park than a mobile home subdivision.

Discussion: A developer can benefit from a number of advantages in developing a mobile home park as opposed to developing a subdivision. These advantages are listed below:

1. Land development and servicing costs are lower than for a subdivision. This is primarily as a result of lower servicing standards and requirements.
2. The approval process is less cumbersome in that subdivision approval is not required.
3. Raw land costs are often lower. Such costs are dictated by the eventual return on the land which is generally considered lower for parks than for subdivisions.
4. Parks provide a good long-term investment and continuous cash flow.

At one time, mobile home parks were considered to be a good temporary or interim use of land. However, today's parks are considered a permanent residential land use. AMHC provides a loan program to assist developers in financing mobile home parks.

3.2.7 Advantages for the Municipality

Issue: In spite of the reluctance on the part of some municipalities to approve mobile home park developments, such developments can provide unique benefits to the municipality which are not feasible with conventional single family subdivision.

Discussion: As was previously noted, much of the historic reluctance on the part of municipalities to approve mobile home parks has been based upon the examples set by poor quality, older parks. Today's mobile home park is a vast improvement over the traditional "trailer park" and can result in some unique advantages to the municipality. Foremost among these is the ability to provide a full spectrum of housing alternatives to its residents. Other advantages are as follows:

1. Within the confines of the park, the municipality generally is not responsible for the provision of basic public services, such as garbage pick-up and road maintenance. Once the development phase is completed, a well run park can provide a "worry free package" for the municipality.
2. Many community/recreation services and facilities are provided within the park itself so that other nearby municipal facilities and programs are not unduly affected. The onus of responsibility for the provision of such facilities and programs is removed from the municipality. At the same time, depending upon the size of the development and subdivision history of a mobile home park parcel, up to ten percent municipal reserve dedication must still be provided and is often located outside of the park for the benefit of all municipal residents.

9 Bernhardt, Arthur: *Building Tomorrow: The Mobil/Manufactured Housing Industry*, 1977, page 245

3. For municipal taxation purposes, the park is assessed and taxed as a single parcel inclusive of all internal roadways and open areas. The issue of municipal assessment and taxation is discussed further in Section 3.6, The Municipal Role.

In spite of these advantages, a major disadvantage of mobile home parks which some municipalities have had to contend with is the lack of control over appearance and maintenance. However, this again is more relevant in the case of older parks.

3.3 Mobile Home Subdivisions

3.3.1 Design and Location

Issue: The same features that result in an attractive, good quality conventional single family residential subdivision should apply to mobile home subdivisions.

Discussion: A good conventional residential subdivision design incorporates curvilinear streets, numerous cul-de-sacs, a variety of lot sizes and shapes, opportunities for adequate side yards and separation space, and landscaped amenity space. A good mobile home subdivision design should incorporate all these same features. To work well, such subdivisions should form part of a larger conventional residential subdivision, but remain exclusive. Ten to fifteen lots on two to three clustered cul-de-sacs appear optimal according to survey respondents. Subdivisions cited as being particularly successful in terms of quality and integration into the surrounding conventional residential neighbourhood are based on this approach. Examples of particularly successful subdivisions can be found in such communities as Hanna, Three Hills, Red Deer, High Level, Grande Prairie and Edmonton. In High Level, the subdivision was designed to allow the mobile home units to be turned at a 90 degree angle and extend across the width of the lot, thereby overcoming the elongated look of the unit. This has been a major contributor towards the successful integration and municipal acceptance of this subdivision. By incorporating smaller mobile home subdivisions into a larger conventional residential subdivision, the occupants of mobile homes share the same access to community services and amenities as do other residents.

The City of Airdrie's Big Springs Mobile Home Subdivision serves as an example of a development which did not follow some of the basic principles which result in successful subdivisions. This large 700 lot development is located adjacent to Highway 2 and is separated from the main portion of the City by that roadway. Highway 2 constitutes a very major barrier, both physically and psychologically. The subdivision was initiated in 1975 in an effort to provide an affordable housing alternative. In response to the study survey, City representatives stated that the legacy of this alternative has left the community "reeling from a number of obvious deficiencies, ranging from poor park development, questionable subdivision design, the ownership versus tenant ratio and, most importantly, the absolute physical size." Generally the area is noted for its "poor design, inadequate amenities and general social-economic short comings."

The Big Springs experience strongly suggests that subdivision design, size and the manner of integration, are crucial to developing good quality subdivisions. This is not to say that larger, exclusive mobile home subdivisions can not be successfully developed. It does point to the fact, however, that such subdivisions should not be cut off from other residential areas, and related community services and amenities. Also, attention to the overall design of the subdivision is particularly important. A study has been commissioned by AMHC and the City to resolve the problems identified in Big Springs.

3.3.2 Appearance

Issue: Mobile home subdivisions can be considered an undesirable intrusion into a conventional residential subdivision if proper attention is not directed to the appearance of the unit.

Discussion: Once again, as is the case with units located in mobile home parks, the appearance of the units located in a mobile home subdivision is a major factor in determining the quality and acceptance of that subdivision. Appearance and unit maintenance are particularly crucial in that such subdivisions often form a part of a larger conventional residential development and are viewed as being more permanent than units located in parks. The appearance factor, more so than any other, was said by survey respondents to detract from the value of adjacent "stick build" residential homes. Actual data to either support or refute this statement is not available. However, information is available which indicates that poorly maintained, unattractive conventional single family dwellings can devalue adjacent dwellings. The same principle likely can be applied in the case of unattractive manufactured housing units.

Much of the feedback obtained for this study indicates that strict architectural controls are required for mobile home subdivisions. Most respondents suggested that the same standards should be applied as were discussed under the section on Mobile Home Parks, but even stronger enforcement is required because of the integration of subdivisions. Particular attention to the appearance and treatment of accessory buildings and garages was considered necessary. Finally, single and double wide units were not considered to mix successfully in terms of appearance.

3.3.3 Advantages of Mobile Home Subdivision Living

Issue: There are some significant advantages to the mobile home occupant to locating in a subdivision on a fee simple lot as compared to renting a stall in a park.

Discussion: The advantages to the occupant of living in a mobile home subdivision, rather than a park, primarily relate to property ownership and are listed below:

1. The ability to own property is the most important advantage to, and reason for, locating in a mobile home subdivision. The occupant often is able to purchase the lot and unit for a lower cost than that of a conventional single family home in a comparable location. Much of this cost saving results from placing the unit on a permanent foundation rather than on a basement.
2. By virtue of owning the lot the unit is located on, equity is increased, particularly since property tends to appreciate, rather than depreciate in value. According to the Reed study, there is some evidence that, in recent years, some appreciation has occurred in the value of mobile homes attached to real property. The sale of the homes in the Lee Ridge Mobile Home Subdivision located in Edmonton between 1974 and 1982 confirm this statement.
3. By virtue of a greater vested interest resulting from property ownership, the occupant is more likely to be concerned with the appearance and maintenance of both the property and the unit. This benefits the occupant, the neighbors and the community as a whole.

3.3.4 Advantages for the Developer

Issue: The advantages of developing a mobile home subdivision as compared to a park are limited and are directly related to the long term objectives of the developer.

Discussion: Most manufactured housing units in urban areas are located in parks, rather than subdivisions. This is partly a function of demand and partly a function of development preference. On the whole, the number of advantages to developing a park are greater than developing a subdivision. Not the least significant of these advantages are lower development costs. The costs of developing a subdivision are slightly lower than costs incurred in developing a conventional single family subdivision, but higher than for a park development. However, one major advantage to developing a mobile home subdivision does exist in that the developer is able to realize a quicker equity return. Once the lots are sold, the developer's responsibilities end and his investment is restored. The commitment to the project and factors such as "carrying costs" are relatively short term. Problems can arise when the demand has not been correctly evaluated, the lots cannot be sold, and the developer attempts to pressure the municipality into allowing conventional "stick built" housing. However, such occurrences do not appear to be common.

3.3.5 Advantages for the Municipality

Issue: Although most mobile home units in urban areas are accommodated in park type developments, there are some advantages which can accrue to the municipality in encouraging the subdivision approach.

Discussion: Just as there are advantages for the developer to developing a mobile home subdivision as opposed to a park, so there are advantages from the municipal perspective. These advantages are as follows:

1. The municipality has greater direct control and impact over appearance and maintenance.
2. Because mobile home subdivisions are usually smaller in scale than parks, they can be more easily integrated into a conventional residential subdivision.
3. Subdivisions are assessed and taxed on the same basis as all other single family subdivided parcels, which some municipalities may consider an advantage. Again, the issue of municipal assessment and taxation is discussed further in Section 3.6.

An overall advantage of encouraging some mobile home subdivision development to occur within a community, as well as conventional subdivision, again is to provide a full spectrum of residential accommodation options.

3.4 Other Ownership Options

Issue: Based upon the experience of regions beyond Alberta, there is a demand for land ownership in a park like setting. Such ownership can result in very successful, high quality mobile home parks.

Discussion: Park ownership by occupants rather than a single landlord has been attempted in Alberta only through the cooperative approach. Under this approach, a cooperative, which owns the park, is formed. Shares are issued and each mobile home occupant purchases a portion of these shares. The cooperative manages the park and maintains the common area and facilities. If the occupant wishes to move, he must sell his share(s) to the cooperative. The cooperative then sells the share(s) to a new occupant. The mobile home park located in Castle Downs, Edmonton is an example of such a cooperative venture. Interestingly enough, this park was the most attractive and well maintained of all the Edmonton parks surveyed during the course of this study. The principle of "vested interest" affecting quality and pride of ownership is very evident.

The second option available for owning property in a park setting is the bare land condominium approach. This approach is examined in some considerable depth in the "Bare Land Condominiums in Alberta with Comparisons Made to Examples in British Columbia" report, prepared in 1986 for the Alberta Department of Housing. The bare land condominium legislation was introduced into Alberta as a result of a request from the Manufactured Housing Association. The Association felt that "the development of mobile home parks that could be owned by the residents would be preferable to the present system where the space occupied by a mobile home unit now has to be rented."[10] Other reasons for introducing the legislation were: the potential for flexibility and innovation in the design and subdivision of the park; and, the opportunity to target a particular market segment, one that sought greater security, privacy and exclusivity."[11]

Although the legislation has been introduced in Alberta which would allow for bare land condominium development to occur, no such developments have actually taken place. The Alberta Housing report attributes this to the major difference in legislation between British Columbia and Alberta. In Alberta, unlike British Columbia, the bare land condominium form of development must comply with the Alberta Planning Act as well as the Condominium Act. As such, a bare land condominium development must conform to all provincial subdivision regulations and obtain two sets of approval. These requirements may be too restrictive to allow economic development of bare land condominiums for mobile home parks.

The best and most successful British Columbia example of the bare land condominium approach is Summergate Village in Sidney. The park contains some 236 mobile home units designed in three stages. Standards and regulations are in place which apply to each unit lot. The Condominium Association operates and maintains all roads, public space and facilities. Although only minimum landscaping guidelines are set out in the Condominium Association Agreement, the residents put considerable effort into maintaining and improving their lot. This again demonstrates the "pride of ownership" which can result when occupants have a vested interest in their property and their community. The result in Summergate is a "highly attractive park like development."[12]

10 Keith Driver and Associates Ltd.: *Bare Land Condominiums in Alberta With Comparisons Made to Examples in British Columbia*, Alberta Department of Housing, June, 1986, page 3.

11 Op-cit., page 3.

12 Op-cit., page 15.

3.5 Planning Standards

Issue: The planning standards set forth in today's statutory plans are extensive and considered adequate by most of the planning authorities and agencies contacted. Yet application of the prescribed standards does not necessarily result in a good quality manufactured housing development.

Discussion: Prescribed standards in Alberta for development of any form are set forth by the local land use by-law. Most communities recognize manufactured housing development in their by-laws and make provision for both Mobile Home Parks and Mobile Home Subdivisions. The by-law prescribes minimum standards for such elements as: density, yard size and set backs, lot areas, roadway widths, siting, building, appearance and accessories standards, skirting and foundation treatment, and floor area ratio. The standards vary between communities and often reflect the type of community the residents want.

Most of the planning authorities and agencies contacted felt that existing standards are generally adequate in that increased standards will not necessarily guarantee good design and a quality end product. Rather, the ultimate quality of the housing product rests with the development industry and the industry's commitment to that product. As one municipal representative indicated, the current planning system provides enough regulation to implement good design and development. However, the quality of the final end product is a unique response to certain needs and market conditions. Local approving authorities can require quality, but this should be implemented through individual development agreements and architectural control. Regulations which are too stringent may result in unwarranted "road blocks" to development approval and innovative design.

What is needed according to many of those contacted, therefore, are more guidelines for ensuring local authorities know how to judge quality and more emphasis on comprehensive development agreements — agreements which address long term maintenance, landscaping and architectural controls. Such agreements are common place for other forms of residential development. Greater use of the Direct Control District in the land use by-law is also an option to consider for ensuring quality. Finally, examples of innovative approaches to mobile home developments, rather than more control, was identified as a need, particularly for smaller communities.

3.6 The Municipal Role

3.6.1 Municipal Attitudes

Issue: Manufactured housing developments are not encouraged by some municipal councils and, at times, have been discriminated against.

Discussion: The feedback obtained with respect to this issue suggests that some municipalities have tended to discourage and discriminate against this form of development, but no more so than for any other form of development with a "poor track record" in their community. Much of the opposition the manufactured housing and development industry encounters is in communities with poor quality mobile home developments. This appears to apply more to communities located in northern Alberta where "trailer parks" are more prevalent, than in southern Alberta.

The converse also applies with respect to this issue in that those communities which have experienced few problems with manufactured housing developments do not tend to discourage or discriminate against such developments. They base their decision on a demonstrated need or market for mobile home units. Such municipalities generally review and approve manufactured housing development in the same manner that they consider all types of residential development.

Public opposition plays a large role in those communities where discrimination still exists. Often residents of existing conventional, single family homes are concerned about the negative impacts on property values, and the introduction of an undesirable socio-economic element in their neighbourhood. This again is based upon the perceptions of mobile home developments stemming from poor examples of such development. Some councils have historically attempted to address resident concern by directing manufactured housing developments to locations outside residential areas. Such policies are seldom enacted today because of the many other problems which can arise "down the road."

Another reason why some municipal councils discourage manufactured housing development deals with assessment and revenue generated by mobile home parks. Such councils feel that although the residents of the park require the same social and community services as residents in conventional subdivisions, the amount of tax revenue generated is

subdivisions, the amount of tax revenue generated is not sufficient to pay for such services. When compared to tax revenue generated by the same area of single family development, the mobile home park pays less. Mobile home park owners and developers will argue that this is not the case. First, they state, a park is assessed on its total land area inclusive of roadways and open space. In conventional residential subdivisions, roads and parks or municipal reserve lands are dedicated to the municipality. Only the lots themselves, or the net area, are assessed. Further, developers contend that the park requires a lower level of municipal service in that snow removal and road maintenance, garbage collection and upkeep of green space is all the responsibility of the owner. It is beyond the mandate of this to study to undertake a comparative evaluation of the tax revenues generated by a mobile home park and a same sized residential subdivision. However, this issue is currently being examined by Alberta Municipal Affairs.

Where a developer encounters municipal opposition on the basis of assessment and tax revenue, the developer may wish to undertake his own site specific comparison to demonstrate the economic viability of the project. Based upon the input from municipalities and planning and approval agencies, assessment and revenue are not a prime concern for most councils.

The most effective method of garnering council's support and overcoming resident opposition is by example. Good quality examples of successful developments which have been sensitively integrated into other communities can overcome considerable opposition if the examples are properly presented. Also, as for any other form of residential housing development, concern with overall appearance and design, and provision of amenities over and above "minimum standard" requirements, can help ameliorate many resident concerns based on exposure to poor quality parks. Exceeding minimum requirements demonstrates sincerity and commitment to a project. In Peace River, for example, council has consistently turned down mobile home development proposals on the basis of problems with such existing developments and resident opposition. This has occurred in spite of local planning staff efforts to present the proposals in a positive light. However, as a result of the approval of the Daishawa Pulp Mill, the Town must increase its housing stock in the short-term to meet a significant demand. The Town has approved the development of a mobile home park on a site overlooking the Peace River to meet this short-term demand. Approval was based not only on the relative immediacy of occupancy related to park development and manufactured units, but also on the high quality of park development which was proposed, and the developer's "track record" in other areas. The development proposal exceeds minimum open space, landscaping, and appearance requirements and is based upon an aesthetically pleasing design concept. These features demonstrate the sincerity of the developer to produce a high quality end product.

It was suggested by many respondents, that decision makers, and the manufactured housing and development industry alike, would benefit from a set of guidelines which would allow them to properly evaluate and design manufactured housing projects. Such guidelines should particularly consider sensitive integration with existing conventional residential development.

3.6.2 Municipal Role

> **Issue**: The municipality should provide opportunities for manufactured housing developments.

Discussion: Most municipalities recognize manufactured housing as a "bonafide" housing alternative. This is reflected in local land use by-laws and some general municipal plans. The recognition of such housing as a legitimate residential land use in the land use by-law, in itself creates opportunities for development. In effect, the same opportunities are created as for any other form of housing. To go beyond this in terms of creating opportunities, and promoting manufactured housing, is not considered by most respondents to be council's purview. Often opportunities result from market demand and council's tend to recognize such demand. Generally, the market demand for mobile home units has been decreasing in many areas of the Province as conventional housing becomes more affordable. Nevertheless, some demand is still evident, particularly in resource areas and in urban centres where units are sited in attractive, well designed and well maintained parks.

3.7 The Role of Industry

> **Issue**: The manufactured housing industry must take a more active and positive role in promoting and marketing their product in order to overcome persistent negative perceptions, and to capture a larger share of the housing market.

Discussion: The above statement summarizes the overwhelming response of virtually all municipal and regional planning approving authorities and agencies in discussing the role of the municipality in delivering and promoting manufactured housing. In other words, most respondents felt that the manufactured housing industry must assume the same role as all other segments of the housing industry. Comments pertaining directly to the role of manufacturers include:

1. A need to be more sensitive to user preferences.
2. A need to continually upgrade the "look" of the product with "state of the art" technology available from other countries so that the product can be made more acceptable to community residents.
3. A need to lobby owners of existing, poorly designed and maintained parks to make improvements over time. Measures such as decreasing densities, improved maintenance standards and landscaping should be considered. This will help to improve public acceptance of manufactured housing products.
4. A need to consider architectural techniques which would allow for some greater variety and individuality to the unit and, as such, better integration and higher quality developments.
5. A need to improve communication and liaison with land developers and municipal councils, and to be sensitive to the needs of each.
6. A need to advertise, promote and educate municipalities and consumers about today's better quality product.

Many respondents felt that today's manufactured housing unit has vastly improved over the traditional 1970's model, but that the public and many municipal councils are basically unaware of the improvements. What is needed is a concerted and an ongoing marketing blitz to overcome traditional prejudices and to benefit the industry.

Similar comments were directed towards the development component of the manufactured housing industry. Specific comments are listed below:

1. A need to better understand and follow the development process.
2. A need to be more sensitive to user needs and preferences.
3. A need to ensure that developments take advantage of new and innovative designs and approaches for providing a quality environment and way of life for mobile home occupants.
4. A need to be more aware of the concerns of existing residents and the community and ensure sensitive integration into the residential fabric of the community.
5. A need to improve liaison and communication with municipal council and the producers of manufactured housing.

For both the unit product and the development, respondents agreed that design improvements and innovation should be ongoing. This is certainly the case in the conventional housing industry. The skills and techniques do exist which would allow for improvements in appearance, variety, design, siting, lot treatment and occupant commitment to continually upgrade and maintain their parcel, be it leased or owned. The bottom line is the final cost to the consumer. But studies and surveys have shown that consumers will pay more for extra amenities such as communal play areas and recreation centres, good maintenance, and a sensitivity to the need for some degree of privacy. A strong emphasis on good site design can provide many of these amenities.

In summary, if the industry wants to overcome negative perceptions and capture a greater share of the housing market, it must work as a cohesive unit and advertise, promote and market its product. As one respondent indicated, "the industry can't sit back and let everyone do it for them." Perceptions which have evolved over many years cannot be changed "over night" and a concerted marketing strategy must be ongoing. Where this approach has been attempted, the result has been local acceptance, a high quality living environment and a successful financial venture.

4.0 Concluding Statement

The manufactured housing issues identified and discussed in this document strongly suggest that much of the negative thinking related to such housing is outdated and no longer warranted. Today's modern unit, located in a well designed and appropriate setting, provides a viable form of housing accommodation capable of being suitably integrated into conventional urban residential areas. However, there is no question that work is needed to convince municipalities of this, and to overcome historically rooted negative perceptions.

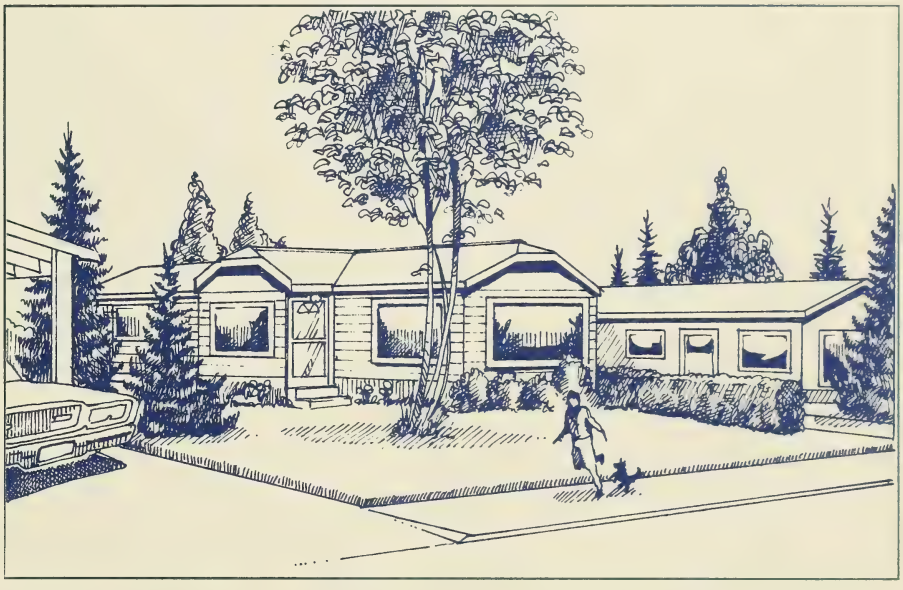
Most respondents to the mailout survey had very pronounced views on what was needed to improve and promote the image of manufactured housing as a legitimate and reputable segment of the housing market. The literature survey also identified what has been done elsewhere to facilitate manufactured housing developments. The following points summarize what is required in the Alberta context in order to improve the image of manufactured housing and ensure good quality development.

1. Development proposal evaluation guidelines for use by planning and administrative staff, municipal decision makers and developers. The guidelines should address features such as amenity space, landscaping, buffering, integration methods, and appeal of overall design.
2. Increased use of implementation mechanisms such as the development agreement and Direct Control Districts to ensure "quality" development.
3. Examples of innovate designs for use by the industry, and planning and municipal authorities, which can be adapted universally in Alberta communities.
4. Architectural control guidelines to assist manufacturers, developers and planning and municipal authorities in ensuring an aesthetically pleasing and compatible manufactured housing development.
5. A more appropriate term than manufactured housing to replace the term mobile home and all the negative connotations related to that term. Manufactured housing encompasses too many other housing types to be directly synonymous with mobile home.
6. A more concerted and active promotional and marketing effort on the part of the manufactured housing industry, similar to that undertaken by other segments of the housing industry.
7. Greater manufacturer, developer, planner and municipal communication and liaison. A more cooperative approach is needed.

Part II of this document directly addresses the first three requirements. The use of these guidelines also will facilitate the final, and perhaps most important, requirement — increased communication, liaison and cooperation between the manufacturer, the developer, the planner and the municipality. The ultimate beneficiary of increased cooperative efforts will be the user.

Part II:

- Guidelines



5.0 Land Use Planning and Design Guidelines

6.0 Guideline Implementation

5.0 Land Use Planning and Design Guidelines

5.1 Project Location

Guideline 1: Locational Compatibility

If manufactured housing is to be treated as a viable housing form, then it should be subject to the same locational requirements as other housing of similar density within the municipality. This means that manufactured housing projects should not be located in predominantly industrial or commercial areas, or areas which are undesirable or incompatible for any form of single family housing. They should be located in predominantly residential areas. This criteria should apply to both urban and rural locations, although rural settings usually present fewer constraints.

Guideline 2: Municipal Policies

Local policies for the siting of manufactured housing should be provided at the General Municipal Plan level, and implemented through the Land Use Bylaw. Lands can be specifically designated for manufactured housing, or considered for such use in longer-term urban reserve areas. Proposed development locations should conform to these policies where such policies exist. If such policies do not exist or do not support manufactured housing at a chosen project location, then the developer and municipality should jointly consider the merits of the proposed location and/or policy amendment.

Guideline 3: Proximity

Convenient proximity to community services and facilities may be especially important to manufactured housing residents depending on the age and income structure of the residents. Proximity to schools or school bus service is obviously important for students. Senior citizens may require proximity to public transportation, shopping and personal services. The same maximum walking distance standards applied to conventional single family residential areas should also apply to manufactured housing projects. In the absence of municipal standards, the following generic guidelines should be used:

- Public Transit* - 800 metres (1/2 mile)
- Elementary School - 400 metres (1/4 mile)
- Secondary School* - 1600 metres (1 mile)
- Commercial - 1200 metres (3/4 mile)
- Neighbourhood Park* - 400 metres (1/4 mile)
- Police/Fire - as per Code

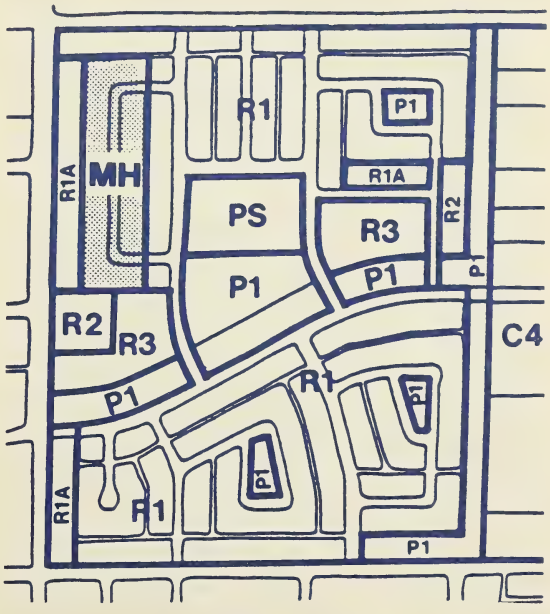
*Note: Some proximity guidelines used in large urban settings are not appropriate in smaller communities and rural settings.

5.2 Project Setting

Guideline 4: Integration

Owing to the inherently different form of conventional and manufactured housing units, complete integration of these units on a lot-by-lot basis within one commonly defined area or neighbourhood is not recommended unless fully supported by the affected residents.

Athough lot-by-lot integration of manufacured housing units with "stick built" houses is usually not recommended and feasible in large urban centres, this approach has proven to be fairly well accepted in certain situations. The statutory plans and land use bylaws of some Alberta smaller urban centres allow lot-by-lot integration as long as certain design and density guidelines are met. Lot-by-lot integration may also be considered in rural subdivisions and in resort areas. Again, care must be given to ensure compatibility between the manufactured housing units and stick-built houses.



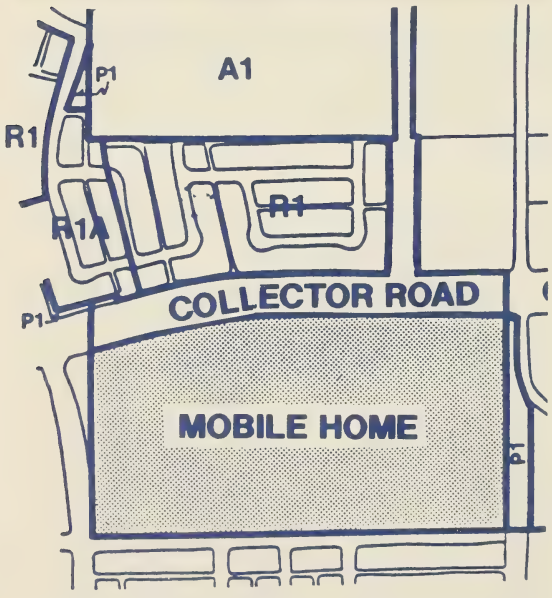
Example of complete manufactured housing cluster integration into residential subdivision.

Subdivision:

Manufactured housing "subdivisions" should be allowed to integrate within single family residential areas only if the conventional and manufactured units will be similar in appearance and density. This type of integration should be intermixed within a residential neighbourhood in 2-3 clusters of no more than 20-25 manufactured housing units per cluster.

Park:

Manufactured housing "parks" should be allowed to locate within the same general area as other planned multi-family rental development areas. They should also be permitted in conventional single family housing areas only if such development is compatible with the adjacent land use.



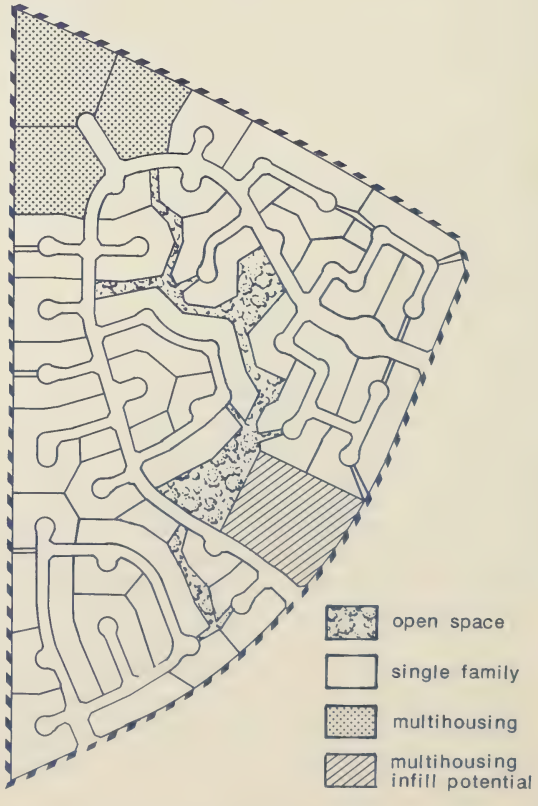
Example of partial integration of manufactured housing park into residential subdivision. Note that manufactured housing park is separated from R1 and R1A Single Family Residential areas by major collector road.

Guideline 5: Infill

One method of integrating manufactured housing subdivisions and parks within a residential area is to infill vacant multi-family parcels. Developers should consider purchase of such parcels if market conditions have not supported the multi-family projects. The parcels may be already districted for multi-family development, or designated as such in approved statutory plans such as Area Structure Plans. The number of lots available through this type of infill development will be dependent on the size of the parcel and the permitted unit density. For example, by using an average gross unit density of 16 units/hectare (6.5 units/acre) and a typical multi-family parcel size of 2 hectares (5 acres), the infill approach would not exceed approximately 30 units.

Municipalities should consider supporting this approach for four important reasons:

- The parcel in question will have already been planned for rental or multi-family accommodation.
- The parcel is presumably not generating any development interest.



Example of planned, undeveloped Multi-Housing Site with Manufactured Housing infill "Potential".

- The style and density of manufactured housing might be more compatible with, and perhaps, more acceptable to, adjacent conventional single family housing areas as compared to multi-family developments.
- Many of the locational and proximity criteria recommended for manufactured housing housing will have already been considered in the planning of the multi-family area.

In smaller communities, it may be possible to infill vacant single family housing lots with manufactured housing units.

Guideline 6: Site Characteristics

Most of the site selection criteria applied to conventional housing also apply to manufactured housing projects. The site slope should not exceed an 8 percent grade. This will avoid the costly site grading required to accommodate the long, narrow lot/road relationship in manufactured housing developments. Geotechnical conditions must support unit foundation, roadbuilding and underground utility installation.

The preservation of natural vegetation and slopes is especially important in manufactured housing areas in order to help created the much needed visual variety. Trees should be strategically preserved. Curvilinear streets should take advantage of slopes. Both the natural vegetation and topography should also be used where applicable to visually buffer the manufactured housing edge as a transition to adjacent land uses.

Example of preserving native vegetation and materials in site landscaping.

5.3 Land Use Elements

Guideline 7: Comprehensive Planning

Manufactured housing developments within new urban settings should be planned in association with other lands at the Area or Neighbourhood Structure Plan stage. This comprehensive planning will establish overall land use elements such as:

- Overall roadway hierarchy
- Housing and density pattern
- Commercial sites
- Schools and community services
- Active and passive open space
- Buffer areas and walkways
- Overall utility schemes

As a general rule, area structure plans may not be necessary, nor are they requested by municipalities, for independent projects which are less than 16 hectares (40 acres) in size and/or are located in isolated rural settings.

Guideline 8: Provision of Open Space

The provision of open space for both active and passive recreation is an integral part of all residential land development in Alberta. The need for open space is as important for manufactured housing residents as for any housing form resident. Manufactured housing projects should not be exempt from this land use requirement.

Subdivision:

Where a parcel is being developed as a manufactured housing subdivision or bare land condominium project and no previous reserve dedication has taken place, the requirements of the Planning Act will apply. In this case, up to ten percent of the gross developable area of the parcel or of appraised market value cash-in-lieu payment or a combination of both may be required by the municipality.

In cases where a reserve dedication and/or cash-in-lieu payment was already fully provided in establishing the parcel for a manufactured housing subdivision or bare land condominium, further subdivision of this parcel will not require further land or cash-in-lieu dedication.

Park:

Internal, private open space for a park development should be as follows:

1. Where the average lot size is greater than 371 square metres (4000 square feet), a minimum of 5 percent of the gross developable area in the project or 28 square metres (300 square feet) per lot should be provided as "useable" open space. Useable open space includes tot lot, playground and amenity landscaping space. This useable open space standard should not include any required buffer strips unless such strips are landscaped and include active outdoor recreation features such as walkways to the satisfaction of the approving authority.
2. Where the average lot size is less than 371 square metres (4000 square feet), 10 percent of the gross developable area should be provided for open space, not including buffer strips unless such strips are landscaped and include active outdoor recreation features such as walkways to the satisfaction of the approving authority.

Guideline 9: Community Facilities

Just as in most conventional housing neighbourhoods, any community facilities for a manufactured housing park or subdivision should be located central to the development. Location of facilities such as an administrative or community centre at a major entrance tends to identify the manufactured housing development as a "project," similar say to a low-income housing project.

5.4 Resident Services

Guideline 10: Service Buildings (Park)

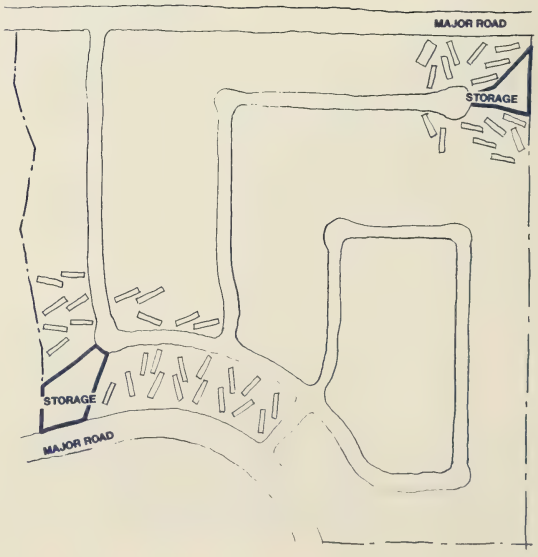
Service areas within a manufactured housing park will usually include maintenance and information functions. The maintenance functions should be well screened and separated from residential areas. Information displays should be visible but small scale, so as to not impact on nearby residential lots. Service areas should have a park-like setting compatible with the surrounding residential environment. Service buildings and other structures should also be designed in a manner compatible with the residential area rather than a commercial development.

Guideline 11: Show Homes

Any permanent builder displays or sales areas should not be located within a manufactured housing subdivision or park. Commercial areas devoted to the sale of units are more properly located in a commercial district. Temporary show homes may be placed on display during the initial construction, marketing and occupancy period of a development, but such displays should be separated and screened from the residential areas.

Guideline 12: Storage (Park)

Inadequate parking and storage space, especially for larger vehicles such as RV's and boats, can result in clutter and visual disarray. Sufficient areas should be designed into manufactured housing parks for the common storage of these seldom-used vehicles. These areas should be both safe and accessible, and allow for passive security. They should be highly visible from outside the development for added security, but visually compatible with adjacent residential areas, and completely fenced and lit. The average storage area size should be 14 square metres (150 square feet) per unit in the development.



Example of good storage yard location with passive security from abutting streets.
Source: Parkridge Estates, Calgary

Guideline 13: Mail Service

Subdivision:

In the case of manufactured housing subdivisions, community mailboxes are usually planned and used as part of the overall community mail service. Early consultation should be undertaken with Canada Post to determine suitable location(s) for such facilities.

Park:

Design of manufactured housing parks must consider the location of community mail centres which use one of the following:

1. Lock box assembly purchased by the park owner and located within a common building such as a recreation or administration building;
2. Community mailboxes which are usually clustered in one or more central, convenient locations; or
3. A mail kiosk or mini kiosk.

The amount of space required for each of these services varies according to the size of the park. The park developer is required to plan for providing mail service in conjunction with Canada Post. Again, early consultation is desirable.

Example of mail kiosk

5.5 Infrastructure

Guideline 14: Roadway Planning

Both manufactured housing parks and subdivisions must be planned using a roadway hierarchy. This hierarchy usually includes collector, local and dead-end (cul-de-sac) roads designed to handle the following traffic volumes:

- Collector road - 1000-5000 vehicles/day
- Local road - 100-1000 vehicles/day
- Cul-de-sac - 0-100 vehicles/day

To ensure emergency vehicle accessibility, all developments of 20 or more lots should have two (2) entrance routes in the form of either a single two-way divided entrance road or two separate access points into the development.

Example of roadway hierarchy

Guideline 15: Roadway Geometrics

Subdivision:

Roadways within manufactured housing subdivisions must be built according to the standards and requirements of the municipality. In the absence of minicipal standards, the minimum geometric standards for roadway developments should be:

1. **Collector Roads** — 20 metre right-of-way with a 10 metre carriageway width for two driving lanes and a paved shoulder.
2. **Local Roads** — no on-street parking to provide greater safety and less visual clutter

using a minimum 14 metre right-of-way with a 7 metre carriageway width for two driving lanes only. Variations can be used to create wider boulevards.

3. **Cul-de-Sac Roads** — must be wide enough to allow unit installations, garbage collection, emergency services and snow storage. An 8 metre right-of-way and a 6 metre carriageway can fulfill these functions, including a sidewalk on one side but no boulevard space. Bulbs should be 30 metres in diameter.

Park:

Roadways within park developments are not dedicated but should still reflect local standards and general engineering practices. Nevertheless, the following option may be considered:

1. Stormwater drainage in the centre of an inverted roadway surface may be permitted where storm sewers are not available, and as an alternative to curb and gutter drainage to avoid curb damage resulting from unit removal and placement.
2. Roads and sidewalks may be completely separated in a park development to avoid sidewalk damage from unit removal and placement, and to better separate pedestrians from parked and moving traffic.
3. Alternative pedestrian movement routes must be provided in a park development if sidewalks are not included and on-street parking is permitted.
4. Minimum geometric standards in a park development should be identical to those in the subdivision case.

Example of inverted roadway surface

Guideline 16: Other Infrastructure

In both park and subdivision developments within urban and rural settings, existing practices for storm drainage, water distribution, sanitary sewer collection and unit foundations must be followed as per CSA Recommended Unit Siting Practices and Alberta Labour Standards.

5.6 Amenity Treatment

Guideline 17: Overall Project Design

The cluster design approach is highly recommended for manufactured housing parks because it creates an inward facing community made up of small, identifiable housing areas. From ten to fifteen units should be located within each cluster, which in turn is served by a single cul-de-sac street running off an internal collector loop street. If dead-end streets are not supported by the approving authority, then clusters of roughly 25 units can be served by a local crescent street also running off the collector loop.

A number of traditional road and utility standards can be reduced in a cluster development without reducing service levels and functions. For example, the use of narrower (eg. 8 metre) cul-de-sac street rights-of-way results in both a cost saving and a cleaner streetscape appearance without rows of parked cars.

Example of cluster design approach.
Source: Mackenzie Regional Planning Commission, Mobile Home Analysis: Town of Peace River, 1988

Guideline 18: Project Density

One commonly held objection against manufactured housing developments is a perception of small lots, crowding and high density. Although the park or subdivision developer wishes to maximize investment, this can still be accomplished by using proper site planning and design techniques. The best technique to ensure a quality residential atmosphere is to limit the density. A project density of 16-17 units per gross hectare (6.5 -7.0 units per gross acre) has been established as optimal based on a cross-section of Alberta manufactured housing projects such as Parkridge Estates in Calgary (17 units).

Guideline 19: Perimeter Treatment

The design of the perimeter or outer edge of a manufactured housing development may include buffering, berming and other special treatment depending on the type of adjacent area. The intent of perimeter treatment should not be to only separate the development from these adjacent areas where required, but also to soften the transition between areas of different land use, scale or intensity of development. The separation can create a feeling of community and identity for the manufactured housing development.

Perimeter treatment need not always involve buffer strips. Depending on site specific conditions such as the type of adjacent land use, noise volumes, views and existing topography and vegetation, one or more of the following basic treatments may be chosen:

- Use of natural tree stands and wider planting rows along peripheral road rights-of-way may be used as natural perimeter treatment;
- A buffer strip may be provided along sensitive perimeter areas such as arterial roads, and conventional housing areas;
- Screening fences in conjunction with soft landscaping may be used where land use separation distance is not essential.

Guideline 20: Entrance/Identity Treatment

Manufactured housing developments can project an identity within the context of the larger community or rural landscape. This identity is also an important marketing factor, and has become an important feature in most new residential developments. The most common way of creating an identity is at the entrance to the development. This is where the

Example of perimiter treatment

Example of entrance treatment

perimeter treatment is interfaced with interior landscaping. The entrance provides the opportunity for unique signage to identify the development. This signage and associated landscaping can form the theme for similar treatments throughout the development. Creating this visual and functional theme at the entrance is recommended as a way of enhancing community atmosphere.

Guideline 21: Streetscape

Particular consideration should be given to visual appearance within a manufactured housing development owing to the physical similarities and horizontal orientation of the units. The streetscape, or view from the street and sidewalk, is especially important in establishing the visual appearance because it is shared by the greatest number of people.

A combination of streetscape order and variety can be accomplished both in the siting and appearance of units, and in the layout of the streetscape. Design recommendations for this streetscape layout are offered as follows, with unit siting recommendations to follow in 5.7:

- Create variety in the flow of the streetscape, and avoid monotonous rows of houses, by using curvilinear street alignments wherever possible;
- Relieve the horizontal emphasis of the streetscape by planting vertical forms of vegetation such as pine or aspen;
- Provide some underlying element of order on the streetscape by using uniform street furniture, planting, fencing and lighting standards;
- At T-intersections where views are terminated, provide a streetscape element such as a boulevard planting bulb to act as a focal point;
- Design parking areas to be as unobtrusive as possible by using screening, changes in elevation and by restricting on-street parking only to collector streets.

Example of good quality streetscape

Guideline 22: Landscaping

One of the most effective ways of enhancing the appearance of manufactured housing developments, and resulting public attitudes, is through intensive use of landscaping. This includes landscaping on both the individual lot and within the public areas of a development. A comprehensive Landscaping Plan and Landscaping Guidelines should be required as a condition of approval of any manufactured housing park or subdivision no matter the size. Natural vegetation should be retained wherever possible, and especially along the perimeter and between housing clusters or individual units. New planting should be harmonious with the existing vegetation, and be of a sufficient size to resist wear.

5.7 Housing Unit Elements

Guideline 23: Lot Size

The size of a manufactured housing lot should be sufficient to accommodate the unit, any expansion or add-ons, accessory buildings and specific activity areas such as yards, parking and privacy areas. Minimum lot size will also depend on the type of unit to be accommodated (eg. single wide versus double wide) and the setbacks being used. A review of relevant literature, plus the recommended density standard previously described in Guideline 18, suggests that minimum lot sizes should be:

- Single Wide - 371 sq. m. (4000 sq. ft)
- Double Wide - 409 sq. m. (4400 sq. ft)

These minimum size recommendations compare to the average stickbuilt single family lot size of 510 sq.m. (5,500 sq.ft.).

Guideline 24: Unit Orientation

The way manufactured housing units are oriented to the street is somewhat flexible, and can be adapted to a site by positioning. Orientation to the street is important because it affects:

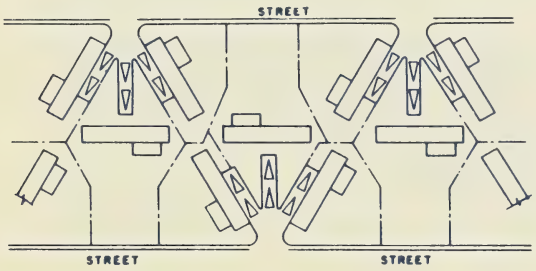
- The initial access route
- Vehicular and pedestrian routes
- Positioning of door and windows
- Links with yard areas
- Lot size, shape and street frontage
- Visual streetscape perception

Wherever possible, the lot orientation should take advantage of a view, natural vegetation and adjacent undeveloped areas (eg. easements, parkland). Daytime areas should also face a southerly direction for maximum solar exposure. Orientation to the street can be summarized in terms of four basic options which can be used independently or combined:

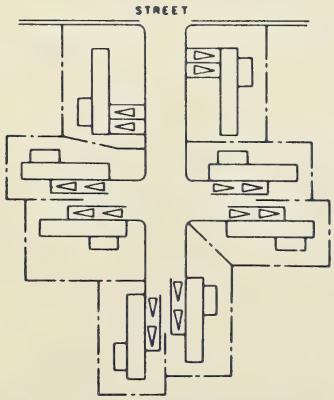
- *Parallel Orientation* — creates lengthy front and rear yards with the rear yard completely screened from the street view. This option requires a relatively large amount of land per lot to create a reasonable side and rear yard area. It also results in a high front footage servicing cost per lot owing to the limited number of services along the street. This approach should only be considered in cases where land costs are relatively low,

and particularly where prominent views and topography can be used.

- **Perpendicular Orientation** — creates long side yards in full view of the street. Screening is usually required to protect these private yards, but the front footage servicing cost is most efficient in this option.
- **Diagonal Orientation** — offers less exposure of side yards to the street, and results in irregular shaped yards. This orientation eliminates the large visual gaps between units and results in a more interesting and varied streetscape if properly located.
- **Combinations** of these orientations can be used as long as a pattern is respected to avoid a haphazard or confusing layout.



Example of Diagonal Orientation

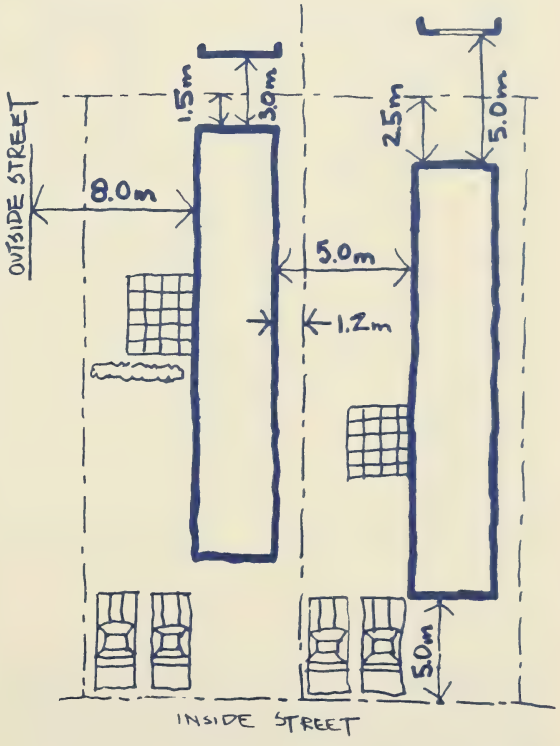


Example of Perpendicular Orientation

Guideline 25: Yard Setbacks

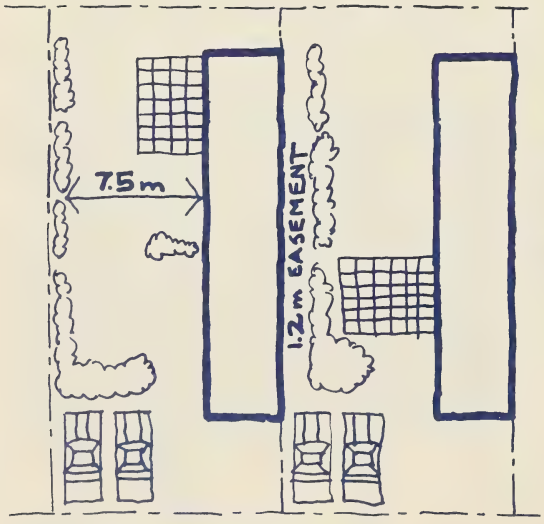
In order to create a sense of privacy and avoid a crowded unit appearance, yard setbacks should be strictly enforced in the site planning and approval process. Generally accepted minimum unit setback standards are:

Unit Setback	Subdivision	Park
1. from an interior roadway right-of-way edge or front lot or plot line	6.0 m (20')	5.0 m (16')
2. from habitable portion of unit to a public area or unplanned future use area	6.0 m (20')	5.0 m (16')
3. from a park or subdivision boundary abutting an outside street	8.0 m (25')	8.0 m (25')
4. between long sides of adjacent units	2.3 m (8')	5.0 m (16')
5. between ends of adjacent units	5.0 m (16')	3.0 m (10')
6. between ends of adjacent units if windows on the ends	5.0 m (16')	5.0 m (16')



Example of Minimum Unit Setbacks in Manufactured Park Development.
Note that Useable Sideyard Width:
5.0 m - 1.2 m = 3.8 m (12.5')

These recommended setbacks apply to a traditional unit siting. Modifications can be made using a Zero Lot Line siting which enhances the size, quality and privacy of the private side yard. By shifting the unit onto a side lot/plot line, and eliminating one of the side yards, the remaining side yard is correspondingly widened and maintenance becomes easier. This added lot width relates well to the manufactured house geometrics. This approach provides more opportunity for patio, deck, lawn and/or play area development along the long side of the unit where the entrances are located. A 1.2 m (4') easement will be required on each lot for access and maintenance. The result is a more spacious lot without increasing the standard lot size. However, the Zero Lot Line approach should not be used or viewed as a means of reducing the standard manufactured housing lot width of 12.5 m (40') for a single wide and 15 m (48') for a double wide unit.



Example of Zero Lot Line Concept
Note that 7.5 m (24.5') useable sideyard width compared to 3.8 m (12.5') in conventional layout.

Guideline 26: Unit Mix

Subdivision:

In subdivision developments, unit mix can be accomplished through the layout of different lot sizes for single and double wide units.

Park:

Interesting streetscapes can be created by grouping various types of manufactured homes within a development. This can be achieved by placing both single and double wide units within housing clusters or along a street.

In general, units which are similar in size, materials, colours and details of construction should be used to avoid a haphazard appearance. Conversely, some mixing of unit types (e.g. single versus double wide) should be attempted in manufactured housing parks to achieve an attractive pattern, as long as the mix is coordinated in terms of colours and design features.

Example of unit mix

Guideline 27: Accessory Structures

The amount of site coverage, location and appearance of accessory structures such as garages, carports and decks should be governed by standards similar to those used in conventional subdivisions. The approving authority should enact development permit conditions and procedures requiring municipal approval of any major accessory structures. Architectural guidelines would be included to control the size, setback, building material and colour of such structures. Also, accessory structures should be located on the lot so as to screen privacy space from the street.

Guideline 28: Access and Parking

Each manufactured housing unit should be provided with two (2) off-street parking spaces. Access to these spaces should be directly off the street using a minimum length of driveway. The actual parking stalls should not be located directly in front of any large window, but rather off to the side of the lot frontage to help screen privacy space from the street.

Group parking should only be considered in small groups of 4-6 manufactured housing units. The group parking area should be located no closer than 6.0 metres (20 feet) from the nearest house so as to not interfere with living spaces.

6.0 Guideline Implementation

The Alberta planning system under the Planning Act is inherently flexible in the manner which municipalities may use planning mechanisms. Manufactured housing project proponents should work with municipalities to determine the appropriate approach to achieve their projects. These land use planning and design guidelines are intended primarily as an advisory tool for use by the developer, the planning authority and the municipality in designing and/or evaluating the merits of a manufactured housing proposal. Advisory guidelines offer no statutory or legislative control over manufactured housing development. They are to be used at the discretion of the municipality and/or developer. The application and interpretation of advisory planning guidelines will in all likelihood vary from one case to another. However, to achieve more consistent guideline implementation and development approval, and to more clearly define the role of manufactured housing in communities, one or more enabling legislation mechanisms may be used. This section reviews these mechanisms in the context of Alberta's planning system. At the same time, the basic development process is also described.

6.1 Regional and Statutory Plans

Establishing the role of manufactured housing within Alberta municipalities should start at the regional and statutory plan levels. These plans can also describe where and how manufactured housing development will be implemented within a municipality.

6.1.1 Regional Plan

The regional plan is by nature a very general description of land use and development policies to be applied within the overall planning region. Planning issues such as quality of life and residential accommodation are addressed in the regional plans through broad policy statements. This is the point at which the role of manufactured housing as a form of residential accommodation within the region can first begin to be addressed. The Urban Settlement and Land Use policies of the Edmonton Metropolitan Regional Plan addresses manufactured (mobile) homes as follows (Part IV, Policy 1.3):

> Urban municipalities should, in their General Municipal Plans and Land Use Bylaws, provide for the following ...
>
> A variety of affordable housing types, including mobile homes, to serve the needs of all social and income groups.

With regional planning commissions being made up of representatives from a number of municipalities, complete acceptance of manufactured housing policies may not always be possible. For example, the attitudes and expectations of urban versus rural representatives may differ on this issue. Differences may also exist between resource based and more conventional communities when considering the role of manufactured housing. Therefore, the role of manufactured housing at the specific municipality level is best left to the local statutory plans.

6.1.2 General Municipal Plan

The General Municipal Plan is the most appropriate mechanism with which to plan for and encourage manufactured housing development at the local level. It must establish policies for all land uses proposed for the municipality. It also designates the general location of these land uses in a comprehensive municipal pattern and provides the implementation procedures. It may include phasing and infrastructural policies.

More specifically, the General Municipal Plan is effective in supporting manufactured housing development because:

1. They are required for every Alberta urban municipality over 1,000 persons and every rural municipality over 10,000 persons, plus most municipalities of lesser population have also enacted such plans;
2. The Plan is future-oriented, and so considers land uses in relation to projected demands rather than existing situations;
3. Most Plans already include development and locational policies for a variety of housing types ranging from single family homes through to medium and high density development where appropriate, so inclusion of manufactured housing policies would not be viewed as preferential planning;
4. The General Municipal Plan is implemented through the local Land Use Bylaw, and so provision for manufactured housing in the Plan would be accommodated through appropriate land use districting (zoning);
5. Subdivision approving authorities are required to make their decisions based in

part on General Municipal Plan policies. Therefore, if an application for a manufactured housing subdivision or development is consistent with the General Municipal Plan, the application would likely be approved, and;

6. The General Municipal Plan is a policy document, and generally does not contain detailed or site-specific development standards which would reduce opportunities for design innovation and flexibility.

6.1.3 Area Structure Plans

Many General Municipal Plans specify that new manufactured housing projects must be planned in the context of an overall, comprehensive Area Structure Plan. This applies mainly to projects which are planned as part of a larger development area in excess of 16 hectares (40 acres), as opposed to isolated or infill projects.

According to the Alberta Planning Act, the purpose of the Area Structure Plan is to provide a framework for subsequent subdivision and development of an area. As such, Plan approval can be required prior to large block subdivisions or issuance of a development permit where the overall pattern of future land use of an area must be considered. In these cases, the municipality or subdivision approving authority can request that a Plan be prepared in support of a development permit or block subdivision for a manufactured housing development. For example, Section 4.3.14 of the City of Grande Prairie General Municipal Plan (1986) states:

> Mobile home parks shall be located as provided for in **Area Structure Plans**. These plans shall contain criteria for screening, buffers and landscaping, open space for play and activity areas, outside storage areas, building appearance, siting of buildings, parking, circulation and access.

The Plans are prepared by the private developer as well as the municipality, regional planning commission or appropriate planning agency. Often, a single developer or landowner making a development proposal may be responsible for preparation of a Plan involving other landowners. The other landowners within the Area Structure Plan boundary will eventually benefit from the Plan approval.

This responsibility issue is important to consider for the manufactured housing developer. The developer may be interested in developing a portion of a larger land holding or planning area. The municipality can, and should, require more comprehensive planning to consider other land use, servicing and development opportunities. The owner/developer may also be interested in developing only a small portion of the landholding. In either case, the Area Structure Plan is the best planning mechanism with which to comprehensively plan for a variety of land uses within one identifiable area. Manufactured housing planning and design guidelines can be included in the Area Structure Plan. Examples of appropriate guidelines are those which deal with location, integration, open space provision, access and transportation.

Consideration of manufactured housing within an urban Area Structure Plan has not been common practice in Alberta. Resource towns and northern communities have been more likely to plan for manufactured housing within the Area Structure Plan process. One the largest examples of this integrated planning was the Timberlea Area Structure Plan approved by the City of Fort McMurray in 1981. The Timberlea community was planned for an ultimate population of 35,000 people residing in a mixture of housing forms including single detached units, townhouses, apartments and mobile homes.

With municipal approval of an Area Structure Plan, local planners, the developer and the local residents are all assured of the housing mix and overall land use pattern within the community. Inclusion of manufactured housing within an approved Area Structure Plan in effect represents municipal approval for this type of development. Similarly, approval of this Plan by council by-law can be seen as representing public input and general support for the manufactured housing component.

6.2 Land Use By-law Districting

Up to this point, the land development process has been described in terms of regional plans and local statutory plans. Development proposals must conform to these policies and plans, but the final implementation stage begins with land use districting, sometimes still referred to as zoning. Districting establishes most of the physical standards and site planning criteria, as well as exact site locations, necessary for final issuance of a Development Permit. It is sometimes debatable if development can proceed without an Area Structure Plan being in place or relevant General Municipal Plan policies being

available. However, there is no debate that the entire development permit approval process is conditional on the appropriate land use districting being in place.

Achieving the necessary districting is where opposition to manufactured housing is most likely to occur. In these cases, the districting process itself should not be singled out as the major development problem or hindrance. This study has stressed that successful manufactured housing development requires a statutory plan framework, strong municipal policy support, manufacturer innovation, and developer promotion and education. If these factors are not in place or are not effective, then it may prove more difficult to obtain appropriate districting for manufactured housing development.

Land use districting is enacted by a municipality by by-law as per the Planning Act. The Act requires in part that the land use by-law divide the municipality into districts and address development criteria such as permitted and discretionary land uses, minimum and maximum area standards, site planning distances and construction requirements. Each municipality prepares and adopts its own by-law, and so they are very locally or municipally-oriented documents. Therefore, the approach used by one municipality does not necessarily reflect how districting is used in other centres. Some of these differing approaches are summarized as follows:

- Four municipalities within the Edmonton Metropolitan Regional Planning Commission do not allow mobile homes in any district. Two municipalities have only MHC-Mobile Home Court districts, while six include both MHC-Mobile Home Court and MHS-Mobile Home Subdivision districts;
- The City of Edmonton Land Use By-law includes a RMH-Mobile Home District where mobile homes are a Permitted use within both mobile home parks and subdivisions, where a single detached home is included as a discretionary use only in a subdivision, and where the minimum lot area is a relatively large 400 square metres (4305 square feet);
- The City of Calgary Land Use By-law has a RMH-Mobile Home District for parks and subdivisions, with mobile homes as a Permitted use, parks limited to between 8 and 16 hectares (20-40 acres) and minimum lot size of 270 square metres (2900 square feet) in subdivisions and 240 square metres (2580 square feet) in parks;
- In the South Peace Region, only two communities do not allow a mix of single family dwellings and mobile homes. Provision is made in these communities for mobile homes to locate in mobile home parks or subdivisions;
- The City of Leduc Land Use Bylaw requires that each mobile home court within the R-MHC Mobile Home Court district must be laid out so as to facilitate future subdivision as per the minimum dimensions of the Bylaw.

Provision for certain districts in a land use by-law does not automatically mean lands have actually been districted or set aside for these uses and are available for development. There are many examples throughout Alberta where the municipality has not districted any land for mobile home courts or mobile home subdivisions. However, with the districting mechanism in place, and assuming a well designed project conforming to the by-law standards which is properly located and well presented, these municipalities would be hard pressed to reject a mobile home redistricting (rezoning) application.

Where redistricting in support of a manufactured housing project is rejected, a number of reasons come into play. Most stem from public opposition to a proposal which is expressed to the Municipal Planning Commission and/or the municipal council. However, land use by-laws themselves can provide a number of grounds for rejection of a redistricting or development permit application. In most cases these grounds involve three basic arguments:

1. **Permitted versus Discretionary Land Use** — When a land use is described as being Permitted in a by-law, this means the development officer **shall** issue a development permit with or without conditions. The officer may also refer such applications to the Municipal Planning Commission who **shall** issue the permit with or without conditions.

   However, discretionary use permits **may** be issued by the development officer or Municipal Planning Commission at their discretion. Discretionary land uses are an

effective way for the municipality to control the issuance of development permits, while at the same time including such land uses in their by-law.

2. **Planning Interpretation** — Land use by-laws provide the development officer and Municipal Planning Commission with certain evaluation and interpretation responsibilities over virtually all types of land development. For example, site development and landscaping approval is usually left to the discretion of the development officer. The municipality can also reject a redistricting and development permit application on the basis of an unacceptable site design interpretation.

   Most land use by-laws reviewed in this study tended to require an extra level of design evaluation and approval for manufactured housing developments. This is in part required because manufactured housing park development does not involve subdivision approval. Negative attitudes and poor examples also result in a perceived need for extra control over manufactured housing development.

3. **Development Requirements** — Manufactured housing has been criticized, in part, on its sometimes compact and cluttered appearance. Many examples prove this concern to be true. Manufactured housing density can be affected both by minimum site requirements and sensitive streetscape design. In the absence of more positive streetscape examples (e.g. curvilinear streets, angled unit orientations and landscaping), municipalities have been forced to apply relatively large minimum lot area requirements. Other requirements for lot coverage, setbacks and yards begin to approximate conventional single family housing development standards.

   As in any development, the applicant is required to meet or exceed all relevant development requirements of the land use by-law. Failure to comply to these requirements is ample justification to refuse a redistricting or development permit application. In the case of manufactured housing, many of these requirements differ amongst municipalities, for example, in the following minimum single-wide lot/plot areas:

   375 sq.m. (4035 sq.ft.) - City of Leduc
   400 sq.m. (4305 sq.ft.) - City of Edmonton
   300 sq.m. (3230 sq.ft.) - City of Lethbridge
   270 sq.m. (2905 sq.ft.) - City of Calgary
   375 sq.m. (4035 sq.ft.) - Town of Devon

   Finally, the by-law development requirements can be effectively used to limit or outright prohibit manufactured housing development within a municipality.

Regardless of these three basic arguments, more often than not, the root cause of redistricting and development approval problems is negative public attitudes. In some cases, problems also stem from a lack of clear and strong policies supporting this form of housing at the local level. This policy support must first be established at the municipal and area planning stage before it can be implemented through districting.

The City of Red Deer Land Use By-law and its R-4 Residential (Relocatable Dwelling Unit) District, included in Appendix IV, provides a clear, simple and flexible example of supportive districting. The manufactured housing developer, like any other land developer, must then follow the seven basic steps to successful land development, namely:

1. Ensure Project/Municipal Policy Conformance
2. Preplan (Area Structure Plan/Site Development Plan)
3. Create Innovative, Exciting Design
4. Strive For Municipality/Developer Cooperation
5. Educate The Public As Required
6. Develop A Political Dialogue With The Municipality
7. Show Developer Determination and Professionalism

6.3 Site Specific Development Control

As an alternative to conventional land use districting, a development project can be approved and implemented using site specific development control legislation. This approach is also termed Direct Control Districting. Unlike districting which provides uniform development requirements, development control is custom made on a site or project specific basis. All Alberta municipalities which have adopted a General Municipal Plan can use this development control approach. The approach allows the municipality to "exercise particular control over the use and development of land and buildings within an area of the municipality" (Section 70, Alberta Planning Act). Such an area is usually designated by by-law as a Site Specific Development Control or Direct Control District.

Most land use by-laws identify only the information topics needing to be addressed in a direct control district. The detailed information is usually prepared by the development applicant, in conjunction with the municipality, based on a comprehensive or detailed site development plan. This plan, in turn, is designed according to the project specific site criteria, land use pattern, development criteria and implementation program.

A site specific direct control by-law usually includes four main sections summarized below and shown by a by-law example in Appendix V:

1. **General Purpose**: what is the specific intent of the Direct Control District;
2. **Area of Application**: identification of the District lands;
3. **Uses**: all land uses proposed within the Direct Control District are listed (there are no Permitted versus Discretionary land uses); and
4. **Development Criteria**: a complete listing and explanation of all the site and detailed planning/design elements pertaining to the Direct Control District, including conformance to other statutory plans, planning and design guidelines, minimum areas and amenity requirements for example.

Once the resulting Direct Control District by-law has been prepared, it requires the same approval process as any other land use districting. However, because the district by-law is tailored for a specific project, thereby recognizing the unique features and special needs of that project, chances of by-law approval may be greater compared to conventional districting.

In terms of practical use, site specific development control (direct control) applies most effectively to small scale projects with easily definable limits and requirements. For example, this districting has become popular with commercial and mixed use projects where comprehensive planning and design issues must be addressed. In the case of a proposed manufactured housing development, a well prepared site development plan can be transformed into a site specific by-law simply by detailing much of its design criteria in written form. Also, most of the planning guidelines presented in this and other manufactured housing studies can be incorporated into the by-law.

In the past, some developers were cautious of site specific development control because by-law preparation is negotiated with the approving authority. As such, there are no initial guarantees of permitted land use or design requirements. Appropriate planning expertise must also be available to the municipality in assisting with by-law preparation and administration. Finally, the municipality is given the opportunity to influence the initial project planning and design throughout the by-law preparation process.

On the positive side, however, most Alberta municipalities now have the required planning expertise, either in-house or from external agencies, to effectively deal with direct control by-law preparation. The need to cooperatively plan a project at the community and site specific level also addresses most of the previously noted criteria for successful land development, namely municipal policy support, municipal/developer cooperation, public education and political dialogue. Assuming planning policies which support manufactured housing are in place, the developer should seriously consider site specific development control as an alternative to conventional districting for a development project.

6.4 The Development Agreement

A municipality may require that a development agreement be entered into as a condition of development permit or subdivision approval. A development agreement is, in effect, a contract between the municipality and the developer, and identifies the roles and responsibilities of each party. The developer will agree to items dealing with engineering standards, construction standards, site maintenance, architectural treatments and landscaping details. The agreement will also include the off-site levies and on-site costs

payable to the municipality for both hard and soft municipal services, and the method and timing of payment. On the other hand, the Agreement will identify the responsibilities of the municipality, especially in terms of scheduling and approvals. A general listing of topics to be included in a manufactured housing park Development Agreement is provided as follows.

1. Definitions
2. Landscaping including percentage of net area to be landscaped and/or developed as recreational open space
3. Maintenance including developer responsibilities plus penalties for non-compliance
4. Mobile Home Standards
5. Caveat on title evidencing the Agreement and conditions

Relatively detailed planning and design guidelines can be included in the Development Agreement. For example, the Agreement may identify the exact type, size and distribution of street trees within a development. It may restrict the color and material of building siding, and identify the developer's responsibility period for landscaping and/or utility installations. Agreements are usually approved by municipal council or an appointed body, by resolution and without public input. It is also important to note that the Development Agreement is required for all types of tenure including subdivisions, parks, cooperatives and bare land condominiums.

6.5 The Development Permit

All Land Use By-laws in Alberta describe the permitting process including the information requirements and application fees. Much of the required information will already be available in the site development plan, site specific development control district if applicable, plus the financial estimates and proforma of the project.

Development Permit approval can become a political and publicly sensitive issue depending on the project. An application can be accepted, rejected or conditionally accepted by the development officer or Municipal Planning Commission. The decision can then be appealed to the local Development Appeal Board by the applicant or anyone claiming to be an "affected" person. This is where controversial projects are sometimes lost although they may conform to all relevant municipal policies and standards.

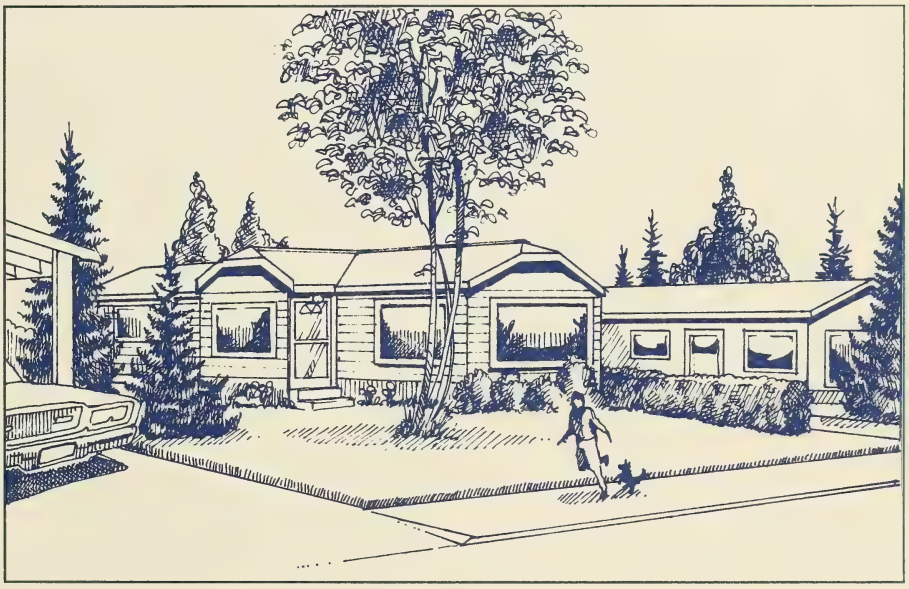
Various suggestions to help ensure Development Permit success, as well as attractive and successful manufactured housing projects, are offered as follows:

1. Avoid, where possible, having manufactured housing termed a Discretionary Use within manufactured housing districts of the land use by-laws. This type of designation means that the Development Permit application may or may not be granted. The Development Officer may be able to issue a Permit more directly if manufactured housing is designated a Permitted land use or is included in a Direct Control District.
2. Work with the Development Officer or local planning authority in preparing the site development plan, and use mutually acceptable planning and design guidelines found in this or other reports.
3. Always weigh the capital cost of required municipality standards, such as oversizing utilities or extensive landscaping, in light of the development proforma and overall chances of municipal approval.
4. Look for development opportunities within those municipalities which have a proven track record in supporting and approving good quality manufactured housing development, as opposed to those where prohibitive policies are in place.
5. Select development sites carefully by researching public attitudes, previous cases and planning policies regarding manufactured housing in the municipality.
6. Preplan the project wherever possible either in the form of an Area Structure Plan where integration is required, or a high quality and well designed Site Development Plan for more isolated or site specific projects.
7. Consider the merits of site specific development control districting to implement a project, and assist the municipality in evaluating or establishing such an approach.
8. In cases where public concern is or may be present, attempt to deal with this concern directly through information campaigns, public education techniques and an attitude of openness.

9. Represent the project as professionally as possible when dealing with municipal council districting applications, Municipal Planning Commission development permit meetings and Development Appeal Board hearing, and engage the help of professional planners, engineers and legal representation where required.

Consideration of the foregoing suggestions will go a long way towards insuring good quality development projects and will benefit both the developer, and the municipality and its residents.

Appendices



Appendix I: Bibliography

Appendix II: List of Contacts

Appendix III: Survey Mailout

Appendix IV: R-4 Residential (Relocatable Dwelling Unit) District — City of Red Deer Land Use Bylaw

Appendix V: Example — Direct Control District Bylaw

Appendix I: Bibliography

Alberta Housing Corporation, "Mobile Home Park Development," 1975.

Alberta Mortgage and Housing Corporation: "Mobile Home Loan Insurance Program," Information and Application Brochure.

Alberta Municipal Affairs, Research and Development Branch: Planning Services Division, "Mobile Home Developments in Alberta," 1988.

Alldritt Development Limited: "The Ranchlands Development Proposal," City of Edmonton, 1985.

Bair, Frederick: "Regulating Mobile Homes," American Planning Association, Planning Advisory Service Report Number 360, 1981.

Bairstow and Associates Consulting Limited: *Manufactured Housing in the United States & Japan*, Canada Mortgage and Housing Corporation, March, 1985.

Bernhardt, Arthur: *Building Tomorrow: The Mobile/ Manufactured Housing Industry*, 1977.

Calgary Regional Planning Commission and Underwood McLellan & Associates Limited: "Airdrie Mobile Home Subdivision," Alberta Housing Commission, 1975.

Canada Mortgage and Housing Corporation: "Facilitating Production of Affordable Housing Through Regulatory Reform and Streamlining Approval Processes," National Conferences of the Canadian Association of Housing and Renewal Officials and the Federation of Canadian Municipalities, 1986.

Canada Mortgage and Housing Corporation: *Opportunities for Manufactured Housing in Canada*, 1985.

Canadian Mobile Home and Travel Association: "Site Planning Kit," 1971.

Canadian Standards Association: CSA Z240 MH Series — M86.

City of Calgary Planning Department: "A Report on Mobile Home Parks — Their Present Inadequacies and Recommended Solutions," 1970.

City of Mesa: "Mobile Home/Recreational Vehicle Code Book," Section 5, Chapter 2 of Mesa Municipal Code, 1988.

City of Regina: "Current Housing Concerns for Regina," 1985.

Cohos, Delesalle & Evamy: "Results of Mobile Home Park Survey," 1973.

Communitas Incorporated: *A Study of Public Attitude Toward Manufactured Housing*, Alberta Manufactured Housing Association, August, 1980.

Delcan, Deleuw Cahner, Western Ltd. & Manufactured Housing Association: *Manufactured Housing Alternative*, Alberta Department of Housing, September, 1983.

District of Coquitlam: By-Law No. 1266, 1982, "A By-law to provide for the establishment of servicing of Mobile Home Parks within the District of Coquitlam."

District of North Saanich: "Zoning By-Law No. 464," September, 1984.

Frost, Garry: "Manufactured Housing in Resource Communities — A New Approach," Alberta Department of Housing, January, 1984.

Gates, Howard: "Life of Manufactured Housing, Manufactured Housing Institute," October, 1986.

Keith Driver and Associates Ltd: *Bare Land Condominiums in Alberta With Comparisons Made to Examples in British Columbia*, Alberta Department of Housing, June, 1986.

Los Angeles Times: "Law Clears Way for More Factory Units," January 22, 1989 Issue.

Mackenzie Regional Planning Commission: "Mobile Home Analysis — Town of Grimshaw," July, 1988.

Mackenzie Regional Planning Commission: "Mobile Home Analysis — Town of Peace River," June, 1988.

Ontario Ministry of Housing: *Mobile Home Projects — Site Planning Guidelines*, 1977.

Parkside Mobile Estates: "Community Responsibilities and Agreements of Residents."

Professional Builder Magazine: "How One City Opened its Arms to Manufactured Housing," August, 1988 Issue.

Province of Saskatchewan: "Saskatchewan Regulation 186/69, Under the Public Health Act," published in the Saskatchewan Gazette, dated Friday, July 18, 1969, Volume 65, No. 29, Pages 383-386.

Reed Management Consulting: *The Mobile Home in Alberta*, Department of Housing and Public Works, December, 1982.

Sanders, Welford: "Regulating Manufactured Housing," American Planning Association, Planning Advisory Service Report Number 398, 1986.

Starr, J.O. "Guidelines for Mobile Home Park Development," The Appraisal Journal, 1971.

The Corporation of the District of Surrey: By-Law No. 6142, "A By-law to regulate and control the location, use and occupancy of mobile homes and trailers, to establish minimum standards governing the construction and maintenance of mobile home parks and tourist trailer parks."

U.S. Department of Housing and Urban Development: *Guidelines for Improving the Mobile Home Living Environment*, 1977.

United Management: "Evergreen Mobile Home Community, Rules & Regulations."

University of Colorado: "Resident Design Preferences — An Exploration of Mobile Home Design Alternatives," College of Environmental Design, Volumes I — IV Spring 1988.

In addition to the foregoing documents, a representative sample of Alberta general municipal plans and land use by-laws were examined. The municipal land use by-laws of particular relevance in developing the actual guidelines were those of the:

- City of Calgary
- City of Edmonton
- City of Fort McMurray
- City of St. Albert
- City of Leduc
- City of Lethbridge
- City of Fort Saskatchewan
- City of Red Deer
- County of Strathcona
- M.D. of Rocky View
- M.D. of Sturgeon
- Town of Gibbons
- Town of Peace River

Appendix II: List of Contacts

Regional Planning Commissions

- Bob Botham
  Battle River
- Ivan Robinson
  Calgary
- R. G. Madziya
  Edmonton Metropolitan
- Gerald Thomas
  Mackenzie
- Lynda Paterson
  Oldman River
- Bob Cundy
  Red Deer
- Jim Muller
  Southeast Alberta
- David Bartley
  South Peace
- Graham Allen
  Yellowhead
- Paul Fenwick
  Palliser

Municipalities

- Julian DeCocq
  City of Airdrie
- Barry Simpkins
  City of Calgary
- Terry Loat
  City of Edmonton
- Dorothy Ann Paget
  City of Fort McMurray
- Gary Hudson
  City of Fort Saskatchewan
- John Hilliard
  City of Leduc
- Gary Weikum
  City of Lethbridge
- Courtney Brekenridge
  County of Parkland
- Ken Kelly
  M.D. of Rocky View
- Wayne Gordon
  City of St. Albert
- Eugene Lee
  City of Strathcona

Agencies and Associations

- Shirley Mercier
  Improvement District Association of Alberta
- Bill Forbes
  Alberta Home Builders' Association
- Alan Skoreyko
  Urban Development Institute
- Bill Walker,
  Alberta Urban Municipalities Association
- Larry Goodhope
  Alberta Association of Municipal Districts and Counties
- Pat Mahoney
  Alberta Association, Canadian Institute of Planners

Alberta Industry Representatives

- Norm Chiles
  Chiles Homes Ltd.
- Bob Lenz
  Triple E Homes Ltd.
- Steve Mandell
  Lakeridge Estates
- Occupant
  Evergreen Mobile Home Park
- John Ratzke
  Parkside Holding Ltd.
- Bill Turner
  Manufactured Housing Association

Alberta Municipal Affairs

- Larry Allen
  Housing Division
- Larry Collins
  Assessment Services Division
- Dale James
  Alberta Mortgage and Housing Corporation
- Lakeland Planning Unit
  Planning Services Division
- Parkview Planning Unit
  Planning Services Division
- Prairie Planning Unit
  Planning Services Division

Alberta Labour

- Standards Division

National Agencies

- Henry Starno
  Canadian Manufactured Housing Institute
- Ken Rauch
  Canada Mortgage and Housing Corporation
- Margo Owe
  Energy Pathways Inc., Ottawa

Canada Post

- Glen Briggs
  Delivery Services
- Tom Parlee
  Delivery Services

Province of Ontario

- Ontario Ministry of Housing

Province of Saskatchewan

- City of Regina
- Saskatchewan Housing Corporation

Province of British Columbia

- B.C. Ministry of Municipal Affairs
- B.C. Ministry of Recreation and Culture
- City of Vancouver
- District of Burnaby
- District of Coquitlam
- District of North Sannich
- District of North Vancouver
- District of Surrey
- Hutton Condominium Services Ltd.
  Strata Administration
- Municipality of Delta
- Town of Sidney

United States

- Susan Osborne
  City of Boulder
- John Gendron
  City of Mesa

Appendix III: Survey Mailout

February 17, 1989

Reference: Land Use Planning Guidelines for Manufactured Housing

As you have recently been made aware by Mr. Tom Hong of Alberta Municipal Affairs, Ms. Olga Lovatt of Lovatt Planning Consultants and Mr. Don Drackley of IMC Consulting Group Inc. have been engaged to undertake the above captioned project. To that end, we, the consultants, are soliciting technical input and professional viewpoints relating to manufactured housing in Alberta. It is our intention to solicit such input both from those persons directly involved in the production and development of manufactured housing projects, and from those persons involved in the approval of such projects.

We have identified a number of key issues and related questions pertaining to manufactured housing in Alberta. These questions (see attachment) are based upon our preliminary research to date and are not intended to be comprehensive. Nor will all the questions necessarily be of interest to everyone. Rather, they provide an indication of the type of input we seek. Please do not hesitate to discuss and present additional issues and viewpoints if relevant. Any documents, reports or position papers dealing with manufactured housing and the types of issues and questions described herein would be greatly appreciated.

We will be contacting you during the week of February 20 to 24 to discuss how to best obtain the required input, be it through written response, appropriate reports, telephone discussions or personal interviews. We would stress that timing is critical and, to that end, would request your input be provided in whatever format agreed upon no later than Friday, 3 March 1989.

We thank you for your kind attention to this matter and look forward to speaking with you in the near future.

Yours truly,

Lovatt Planning Consultants

O. Lovatt, MCIP

Attachment

General Questions

- Is manufactured housing development an issue in your area? If so, describe in a "nutshell" why.
- Is there a demand for manufactured housing in your area which is not being met? If so, why not?
- What has the trend been in your area with respect to the demand for, and the development of, manufactured housing?
- What would you like to see this project accomplish? What end-product?

The Unit

- The design/the "look" of the unit — What's wrong with it in comparison to "stick built"? How is it perceived by surrounding residents? What are the land use implications?
- The life expectancy of the unit — Is investment potential affected? Is stability perception affected? Are property values *really* affected?
- Moving restrictions — Are there locational criteria which must be considered because of the need to transport units, such as access to arterials or topography?
- Any suggested changes or solutions to the unit as it now exists to make it more palatable to owners of conventional "stick built" accommodation.

The Development

- What makes the good manufactured housing parks good?
- What makes the good manufactured housing subdivisions good?
- What makes the bad manufactured housing parks bad?
- What makes the bad manufactured housing subdivisions bad?
- Give examples (if any) of both particularly good or particularly bad manufactured housing parks and subdivisions.
- What are the advantages of the park versus the subdivision from the perspective of:
  - the dweller
  - the neighbour
  - the developer
  - the municipality
- How would you evaluate the following methods for accommodating manufactured housing within the urban fabric?
  - in subdivisions as part of a larger residential plan area
  - in parks located as part of or near larger residential plan area
  - in special theme parks such as a retirement centre or golf centre
  - integrated into RF1 subdivisions with special provisions to ensure compatibility (i.e. permitted or discretionary use)
  - any additional options
- Which would be your preference and why?
- Do different methods meet different needs and what are they?

Planning Controls

- How effective are existing LUB standards in controlling and ensuring good quality manufactured housing developments?
- Where are the shortfalls or gaps in today's LUB regulations?
- What specific new guidelines or standards should be considered?
- Is there a demonstrated need for more control through regulation?
- How much regulation is desirable?
- What types of regulatory implementation measures should be considered?
  - more prescribed standards (LUB)
  - more guidelines in statutory plans (such as)
  - greater use of DC districts
  - more comprehensive development agreements
  - more emphasis on bareland condominium
  - greater use of the IRDA if, indeed, it is applicable and/or desirable
- Does the current Alberta planning system of statutory plans and bylaws discriminate against the manufactured housing as a residential form?

The Municipal Role

- What is the basis, historically, for municipal opposition to manufactured housing developments?
- Is assessment one reason for such opposition?
- Do municipalities, as a rule, discourage manufactured housing developments, even today?
- How active should municipalities be in promoting manufactured housing developments through the provision of various opportunities for accommodating such housing?
- Should municipalities consider Innovative Residential Development Areas as one means of accommodating manufactured housing? Is this a good route to go? If yes, why and if no, why not?
- What sort of things should a municipal decision maker consider when reviewing a proposal for a manufactured housing development?

Appendix IV: R-4 Residential (Relocatable Dwelling Unit) District — City of Red Deer Land Use Bylaw

1. General Purpose of District

To provide land for relocatable dwelling units and relocatable dwelling unit parks.

2. Permitted uses

None

3. Discretionary Uses

(1) Relocatable dwelling unit park

(2) Relocatable dwelling unit

(3) Home occupation

4. Regulations for Relocatable Dwelling Parks

(1) Floor Area: Minimum — 55 m^2

(2) Building Height: Minimum — N/A
Maximum — one storey

(3) Front Yard: Minimum 6 m

(4) Side Yard: Minimum 1.5 m

(5) Right Yard: Minimum 6 m

(6) Landscape Area: Minimum 44% of site area

(7) Parking: Relocatable dwelling unit park — as required by M.P.C.

(8) Loading Space: N/A

(9) Site Area: Relocatable dwelling unit park — as required by M.P.C.

(10) Frontage: Relocatable dwelling unit park — minimum 11 m

5. Regulations for a Relocatable Dwelling Unit (Subdivision or condominium unit)

(1) Floor area minimum 55 m^2

(2) Building height one storey maximum

(3) Front Yard 6 m per setback list

(4) Side Yard
1.5 m on right side
2.35 m on left side
} facing lot from street

(5) Rear yard — 6 m

(6) Landscaping — 44% of lot area

(7) Parking — one stall on site

(8) Loading space — N/A

(9) Site Area
- Single Wide — minimum 350 m^2
- Double Wide — minimum 418 m^2

(10) Frontage
- Single Wide — minimum 11 m
- Double Wide — minimum 14 m

6. Special Regulation

(1) Notwithstanding Section 4 the site plan of a relocatable dwelling unit park shall be subject to approval by the Municipal Planning Commission.

(2) All relocatable dwelling unit parks shall comply with the Provincial Department of Public Health Regulations governing Mobile Homes.

(3) For all relocatable dwelling units not located in a relocatable dwelling unit park the following conditions shall apply:

(a) all relocatable dwelling units shall be placed upon a full foundation of poured concrete or concrete blocks or upon and affixed to concrete piers poured to a depth below frost level, or upon an approved treated wooden basement or foundation.

(b) If a relocatable dwelling unit is placed upon concrete piers, the same shall be skirted from the base thereof to the ground with material similar in design, construction.

(c) Any addition to a relocatable dwelling unit shall be constructed of material similar in design, construction and appearance to the exterior of the relocatable dwelling unit.

(d) All relocatable dwelling units shall conform to the standards of the Canadian Standards Association.

(4) All relocatable dwelling units shall be connected to the City's water and sewer systems.

Appendix V: Example — Direct Control District Bylaw

1. General Purpose

To provide a Direct Control (DC) District for the establishment of a Manufactured Housing use — The "_____" Manufactured Housing Development — with appropriate Site Development Regulations that will result in a high standard of design and development compatible with surrounding uses.

2. Area of Application

The DC District, containing _____ ha (_____ ac) shall apply to:

Legal description

_____

3. Uses

(a) Single Wide Mobile Homes

(b) Double Wide Mobile Homes

(c) Modular Homes

(d) Public Parks

(e) Indoor Participant Recreation Services

(f) Convenience Retail Stores and Personal Services Shops

(g) Public and Private Clubs

(h) Administrative and Maintenance Buildings

(i) Outdoor Storage Areas

4. Development Criteria

(a) All DC District development shall be consistent with policies and guidelines of the "_____" Area Structure Plan, and shall be submitted to and approved by the Development Officer prior to issuance of any Development Permits.

(b) A detailed Site Development Plan for the entire DC District shall be submitted to and approved by the Development Officer prior to issuance of any Development Permits. This Plan shall include the layout and dimensions of all housing lots/plots, public areas, road rights-of-way and other necessary spaces.

(c) A detailed Landscaping Plan for the entire DC District shall be submitted to and approved by the Development Officer prior to issuance of any Development Permits. This Plan shall include details of pavement materials, fencing details, exterior lighting and street furniture elements, pedestrian seating areas, totlots and playgrounds, sizes and species of new planting for the entire project.

(d) The maximum overall density shall be 19 units per gross hectare (8 units per gross acre).

(e) The minimum unit size within the project shall be 302 m^2 (3,250 $ft.^2$) for single wide and 340 m^2 (3,650 $ft.^2$) for double wide units.

(f) The minimum lot/plot width shall be 12.2 m (40 ft.) except in cul-de-sac and clustered lot location where the minimum frontage width at the front lot/plot line shall be 9.0 m (29.5 ft.).

(g) The maximum building height shall not exceed 3.0 m (10 ft.) for residential units and 4.0 m (13.0 ft.) for associated project structures.

(h) All units shall be located at least 6.0 m (20.0 ft.) from an interior roadway right-of-way edge of 5.0 m (16 ft.) from the front lot or plot line.

(i) Ends of units shall be located at least 2.5 m (8.0 ft.) apart, and increased to 5.0 m (16.0 ft.) where windows are located on end walls.

(j) Each unit shall be provided with two (2) off-street parking stalls located on the lot/plot, or in a designated group parking area which must be at least 6.0 m (20.0 ft.) from the nearest residential unit.

(k) Units shall be located so as to create an attractive visual pattern along the street based on unit orientation, color, material, size and style.

(l) The Development Officer shall require, as a condition of approval, that the applicant provide an irrevocable letter of credit or a performance bond, in the amount of 100% of the established landscaping cost for the area covered by the Development Permit, the conditions of a security being that:

(i) If the landscaping is not completed in accordance with the provisions of this District and the Landscaping Plan within one (1) growing season after completion of the development, then the amount fixed shall be paid to the municipality for its use to complete the landscaping; and

(ii) The Development Officer shall not release the landscaping Security until an inspection of the site has demonstrated that the

landscaping has been well maintained and is in a healthy condition two (2) growing seasons after completion of the landscaping.

Note: A similar credit or bond requirement should be added in the case of private utility and roadway construction with a Park development.

(m) Not withstanding the foregoing, this DC District shall be developed in accordance with the Provincial Department of Public Health Regulations governing mobile homes.

N.L.C. - B.N.C.
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